

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JANE DOE 2-4 and CAROLYN LEVY  
GILLIAM as the ADMINISTRATOR OF  
THE ESTATE OF JANE DOE 1,

Plaintiffs,

v.

RED ROOF INNS, INC.;  
FMW RRI NC, LLC;  
RED ROOF FRANCHISING, LLC;  
RRI WEST MANAGEMENT, LLC;  
VAHARI HOTEL, LLC;  
WESTMONT HOSPITALITY  
GROUP, INC.; and  
RRI III, LLC,

Defendants.

Civil Action No.  
1:21-cv-4278-WMR

**AMENDED PROPOSED PRETRIAL ORDER**

Plaintiffs Jane Does 1, Jane Doe 2, Jane Doe 3, and Jane Doe 4 and Defendants Red Roof Inns, Inc., FMW RRI NC, LLC, Red Roof Franchising, LLC, RRI West Management, LLC, and RRI III, LLC, by and through their undersigned counsel, submit this proposed consolidated pretrial order.

**1.**

**There are no motions or other matters pending for consideration by the court except as noted:**

As of the date of this filing, the parties' motions *in limine* and *Daubert* motions are currently pending.

**2.**

**All discovery has been completed, unless otherwise noted, and the court will not consider any further motions to compel discovery. (Refer to LR 37.1B). Provided there is no resulting delay in readiness for trial, the parties shall, however, be permitted to take the depositions of any persons for the preservation of evidence and for use at trial.**

Pursuant to agreement, the parties are completing the depositions of expert witnesses and will cooperate to schedule trial depositions, if any.

**3.**

**Unless otherwise noted, the names of the parties as shown in the caption to this Order and the capacity in which they appear are correct and complete, and there is no question by any party as to the misjoinder or non-joinder of any parties.**

As of the date of this filing, the names of the parties are correctly identified.

**4.**

**Unless otherwise noted, there is no question as to the jurisdiction of the court; jurisdiction is based upon the following code sections. (When there are multiple claims, list each claim and its jurisdictional basis separately.)**

This Court has subject matter jurisdiction over this lawsuit pursuant to 28 U.S.C. § 1331 because Plaintiffs assert claims arising under 18 U.S.C. § 1595(a), and pursuant to 28 U.S.C. § 1367 because Plaintiffs' state law claims form part of the same case or controversy as their federal law claims. There is no dispute as to jurisdiction.

**5.**

**The following individually-named attorneys are hereby designated as lead counsel for the parties:**

**Plaintiff:**

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**Defendants:**

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(314) 256-2544 - Telephone

**Other parties:**

None

**6.**

**Normally, the plaintiff is entitled to open and close arguments to the jury. (Refer to LR39.3(B)(2)(b)). State below the reasons, if any, why the plaintiff should not be permitted to open arguments to the jury.**

None.

**7.**

**The captioned case shall be tried ( X ) to a jury or (\_\_\_\_) to the court without a jury, or (\_\_\_\_) the right to trial by jury is disputed.**

**8.**

**State whether the parties request that the trial to a jury be bifurcated, i.e. that the same jury consider separately issues such as liability and damages. State briefly the reasons why trial should or should not be bifurcated.**

Plaintiffs request to bifurcate the consideration of punitive damages pursuant to O.C.G.A. §51-12-5.1(d), which provides that “the trier of fact shall first resolve from the evidence produced at trial whether an award of punitive damages shall be made.” Then, “[i]f it is found that punitive damages are to be awarded, the trial shall immediately be recommenced in order to receive such evidence as is relevant to a

decision regarding what amount of damages will be sufficient to deter, penalize, or punish the defendant in light of the circumstances of the case.”

Defendants do not agree to Plaintiffs’ request for bifurcation at this time but will meet and confer with Plaintiffs’ counsel.

**9.**

**Attached hereto as Attachment “A” and made a part of this order by reference are the questions which the parties request that the court propound to the jurors concerning their legal qualifications to serve.**

The parties do not request any additions to Judge Ray’s standard jury qualification questions.

**10.**

**Attached hereto as Attachment “B-1” are the general questions which plaintiff wishes to be propounded to the jurors on voir dire examination. Attached hereto as Attachment “B-2” are the general questions which defendant wishes to be propounded to the jurors on voir dire examination. Attached hereto as Attachment “B-3”, “B-4”, etc. are the general questions which the remaining parties, if any, wish to be propounded to the jurors on voir dire examination. The court, shall question the prospective jurors as to their address and occupation and as to the occupation of a spouse, if any. Counsel may be permitted to ask follow-up questions on these matters. It shall not, therefore, be necessary for counsel to submit questions regarding these matters. The determination of whether the judge or counsel will propound general voir dire questions is a matter of courtroom policy which shall be established by each judge.**

**11.**

**State any objections to plaintiff’s voir dire questions:** *See below.*

**State any objections to defendant's voir dire questions:** *See below.*

**State any objections to the voir dire questions of the other parties, if any:**

**12.**

**All civil cases to be tried wholly or in part by jury shall be tried before a jury consisting of not less than six (6) members, unless the parties stipulate otherwise. The parties must state in the space provided below the basis for any requests for additional strikes. Unless otherwise directed herein, each side as a group will be allowed the number of peremptory challenges as provided by 28 U.S.C. § 1870. See Fed.R.Civ.P. 47(b).**

Given the potentially sensitive nature of the subject matter of the lawsuit, which may involve discussion of sex trafficking and prostitution, including physical violence, sexual violence, and sexual trauma, the parties propose a larger panel of 40 potential jurors and a total of 6 peremptory challenges.

Furthermore, given the nature of the facts at issue, the parties also propose that the jurors complete a questionnaire in advance of voir dire. A questionnaire permits jurors to disclose sensitive information in a more discreet manner than if questions were posed in open court.

Attachment "B-3" is a proposed juror questionnaire. The parties have agreed to all but a few of the questions. The disputed questions are shown in yellow highlight in Attachment "B-3." Defendants have not agreed to the inclusion of those

questions, but the parties have agreed to continue to confer in an effort to reach agreement

**13.**

**State whether there is any pending related litigation. Describe briefly, including style and civil action number.**

**Plaintiffs' position:** *W.K. v. Red Roof Inns, Inc. et al*, civil action no. 1:20-cv-5263-VMC, involves similar factual allegations and legal claims arising out of alleged sex trafficking and prostitution at the same two Red Roof Inn hotels.

**Defendants' position:** There are no related cases. The W.K. case involves different plaintiffs, different traffickers, at different time periods and therefore does not arise out of the same or similar occurrences as this case.

**14.**

**Attached hereto as Attachment "C" is plaintiff's outline of the case which includes a succinct factual summary of plaintiff's cause of action and which shall be neither argumentative nor recite evidence. All relevant rules, regulations, statutes, ordinances, and illustrative case law creating a specific legal duty relied upon by plaintiff shall be listed under a separate heading. In negligence cases, each and every act of negligence relied upon shall be separately listed. For each item of damage claimed, plaintiff shall separately provide the following information: (a) a brief description of the item claimed, for example, pain and suffering; (b) the dollar amount claimed; and (c) a citation to the law, rule, regulation, or any decision authorizing a recovery for that particular item of damage. Items of damage not identified in this manner shall not be recoverable.**

**15.**

**Attached hereto as Attachment "D" is the defendant's outline of the case which includes a succinct factual summary of all general, special, and affirmative defenses relied upon and which shall be neither argumentative nor**

recite evidence. All relevant rules, regulations, statutes, ordinances, and illustrative case law relied upon as creating a defense shall be listed under a separate heading. For any counterclaim, the defendant shall separately provide the following information for each item of damage claimed: (a) a brief description of the item claimed; (b) the dollar amount claimed; and (c) a citation to the law, rule, regulation, or any decision authorizing a recovery for that particular item of damage. Items of damage not identified in this manner shall not be recoverable.

**16.**

Attached hereto as Attachment “E” are the facts stipulated by the parties. No further evidence will be required as to the facts contained in the stipulation and the stipulation may be read into evidence at the beginning of the trial or at such other time as is appropriate in the trial of the case. It is the duty of counsel to cooperate fully with each other to identify all undisputed facts. A refusal to do so may result in the imposition of sanctions upon the noncooperating counsel.

Plaintiffs have proposed stipulations of fact. Defendants are considering the proposed stipulations of fact and the parties have agreed to confer.

**17.**

**The legal issues to be tried are as follows:**

**By Plaintiffs:**

- (1) Whether Defendants engaged in racketeering activity, in violation of O.C.G.A. §§ 16-6-9, 16-6-10, 16-6-11, 16-14-3, and/or 16-5-46.
- (2) Whether FMW, RRI West, RRI, and Red Roof Franchising (Collectively “Smyrna Red Roof Defendants”) are liable to Plaintiffs under the TVPRA 18 U.S.C. § 1595.
- (3) Whether RRI III, RRI West, RRI, and Red Roof Franchising (Collectively “Buckhead Red Roof Defendants”) are liable to Plaintiffs under the TVPRA, 18 U.S.C. § 1595.



- (4) Whether Smyrna Red Roof Defendants RRI, and Red Roof Franchising, and RRI West are liable to Plaintiffs for violating the Georgia Racketeer Influenced and Corrupt Organizations Act, O.C.G.A. §§ 16-14-4, 16-14-6.
- (5) Whether Buckhead Red Roof Defendants are liable to Plaintiffs for violating the Georgia Racketeer Influenced and Corrupt Organizations Act, O.C.G.A. §§ 16-14-4, 16-14-6.
- (6) Whether Smyrna Red Roof Defendants are liable to Plaintiffs in negligence.
- (7) Whether Buckhead Red Roof Defendants are liable to Plaintiffs in negligence.
- (8) Whether the Defendants are liable to Plaintiffs for damages, and the amount of such damages, including general damages, compensatory damages, economic damages, consequential damages, punitive damages.
- (9) Whether the Defendants are liable to Plaintiffs for costs, expenses and reasonable attorneys' fees including fees pursuant to the TVPRA, Georgia RICO, O.C.G.A. § 13-6-11, and O.C.G.A. §9-11-68(e) and any other fee-shifting statute.
- (10) Whether Plaintiffs are entitled to punitive damages against Defendants.
- (11) Any additional legal issues raised by any affirmative defenses or counterclaims Defendants may assert.

**By Defendants:**

- (1) Whether Plaintiffs' negligence claims are time-barred by the two-year statute of limitations, which accrued when there was a negligent act coupled with a proximately resulting injury. O.C.G.A. § 9-3-33.
- (2) Whether Plaintiffs' Georgia civil RICO claims are time-barred by the five-year statute of limitations. O.C.G.A. § 16-14-8.

- (3) Whether Defendants can be held liable for allegations of trafficking occurring at the Smyrna location after Varahi Hotels, LLC (Varahi) franchised Smyrna on December 14, 2012 or thereafter, including whether franchisee Varahi was an agent or apparent agent of Defendants, and whether Defendants owed a duty to Plaintiffs after that time.
- (4) Whether Defendant Red Roof Franchising, as the franchisor of the Smyrna property after December 14, 2012, or any Red Roof Defendant can be held vicariously liable for the acts or omissions of the franchisee, Varahi, including whether any Defendant obligated itself to pay the debts of Varahi, and whether Varahi was an alter ego of the franchisor.
- (5) Whether Red Roof Defendants maintained ownership, operation, and/or control of the Smyrna property after it was franchised to Varahi on December 14, 2012.
- (6) Whether Plaintiffs can meet their burden to prove that Defendants are liable for negligence, including whether the intervening criminal actions of third parties (the traffickers, John Doe Johns, and John/Jane Doe Accomplices) were reasonably foreseeable, which would trigger a duty to take ordinary precautions to protect against a third party's intervening criminal acts. O.C.G.A. § 51-3-1.
- (7) Whether Plaintiffs had superior knowledge of the specific dangers of the commercial sex trade as compared to Defendants.
- (8) Whether and what percentage of fault should be apportioned to various non-parties identified in Defendants' Notices of Intent to Seek Apportionment of Fault Against Non-Parties (ECF Doc. Nos. 66, 67, 68, 69, 302, and 312), including: Plaintiffs' various alleged traffickers; the alleged purchasers of sex and sexual acts performed by Plaintiffs (John Doe Johns); individuals who allegedly provided help and assistance to Plaintiffs' traffickers (John and Jane Doe Accomplices); owners and operators of additional hotels where Plaintiffs were allegedly trafficked; online websites where Plaintiffs were allegedly subjected to online advertising for the sale of illegal commercial sex; Varahi Hotels, LLC (Varahi) franchisee and owner/operator of the Smyrna location starting on December 14, 2012; and security companies providing security

services at the Smyrna and Buckhead locations during some or all of the time periods of Plaintiffs' alleged trafficking. O.C.G.A. § 51-12-33.

- (9) Whether the acts or omissions of any third party (including those for whom apportionment of fault is sought) constitutes a superseding/intervening cause such that the alleged causal connection was broken between Defendants' alleged acts or omissions and Plaintiffs' alleged injuries.
- (10) Whether Plaintiffs engaged in acts of voluntary commercial sex (prostitution) or were trafficked as required by the TVPRA by means of force, threats of force, fraud, or coercion. 18 U.S.C. § 1591.
- (11) Whether Defendants can be held liable as a beneficiary under the TVPRA, including whether Defendants directly and knowingly participated in a venture with Plaintiffs' alleged traffickers, which they knew or should have known was a violation of the TVPRA, whether Defendants knowingly benefitted from Plaintiffs' alleged trafficking, and whether Defendants knew or should have known that each individual Plaintiff was being trafficked in violation of the TVPRA. 18 U.S.C. § 1595.
- (12) Whether Plaintiffs' recovery is barred because they engaged in the commission of any alleged predicate act under GA RICO, and cannot recover for any crimes that they committed.
- (13) Whether recovery for each Plaintiff's injuries should be limited or barred as a result of her own contributory and comparative fault, due to her own intentional, negligent, or criminal conduct which contributed to or caused her alleged injuries and damages, including whether each Plaintiff assumed the risk of injury.
- (14) Whether Plaintiffs' alleged injuries and damages are fully or partially due to pre-existing and subsequent conditions and events unrelated to the alleged trafficking, including but not limited to health or mental health conditions, physical, mental, and sexual abuse, and drug use, abuse, and dependence.

- (15) Whether Defendants can be held liable for claims by Jane Does 1 and 2 with respect to allegations of trafficking occurring at the Smyrna location, including whether franchisee Varahi (or any agent or employee of Varahi) was an agent or apparent agent of any of the Defendants.
- (16) Whether Plaintiffs can meet their burden to prove that Defendants violated GA RICO, including whether Defendants were involved in a pattern of racketeering activity, whether each Plaintiff was the intended target of any alleged predicate act, and whether each Plaintiff's injury was the direct result of a predicate act targeted toward her, such that she was the intended victim. O.C.G.A. § 16-14-4.
- (17) Whether Plaintiffs can meet their burden to prove that Defendants directly and knowingly engaged in trafficking an individual for sexual servitude or keeping a place of prostitution in violation of GA RICO, or intentionally encouraged, aided, or abetted another to commit those crimes. O.C.G.A. § 16-14-1, *et. seq.*
- (18) Whether Plaintiffs can meet their burden to prove that any act or omission allegedly committed by an agent or employee of Defendants, and that is alleged to constitute evidence of negligence, a violation of the TVPRA, or of Georgia RICO, whether such act was committed within the course and scope of his employment and on behalf of Defendants.
- (19) Whether Plaintiffs can meet their burden to prove that Defendants knowingly and willfully joined a conspiracy with a common plan or purpose to commit two or more predicate acts in violation of GA RICO, and whether an overt act to effect the object of the conspiracy was committed.
- (20) Whether Plaintiffs' claims are barred or limited by the doctrines of acquiescence, waiver, estoppel, or laches.
- (21) Whether Plaintiffs' claims are barred because they have released, settled, entered into accord and satisfaction, or otherwise compromised their claims.

- (22) The amount and extent of alleged injuries and damages incurred by each Plaintiff, and whether Plaintiffs' alleged injuries and damages were proximately caused by Defendants.
- (23) Whether Plaintiffs are entitled to an award of punitive damages.
- (24) Whether Plaintiffs are entitled to an award of attorney's fees.

**18.**

**Attached hereto as Attachment "F-1" for the plaintiff, Attachment "F-2" for the defendant, and Attachment "F-3", etc. for all other parties is a list of all the witnesses and their addresses for each party. The list must designate the witnesses whom the party will have present at trial and those witnesses whom the party may have present at trial. Expert (any witness who might express an opinion under Rule 702), impeachment and rebuttal witnesses whose use as a witness can be reasonably anticipated must be included. Each party shall also attach to the list a reasonable specific summary of the expected testimony of each expert witness. All of the other parties may rely upon a representation by a designated party that a witness will be present unless notice to the contrary is given ten (10) days prior to trial to allow the other party(s) to subpoena the witness or to obtain the witness' testimony by other means. Witnesses who are not included on the witness list (including expert, impeachment and rebuttal witnesses whose use should have been reasonably anticipated) will not be permitted to testify, unless expressly authorized by court order based upon a showing that the failure to comply was justified.**

**19.**

**Attached hereto as Attachment "G-1" for the plaintiff, "G-2" for the defendant, and "G3", etc. for all other parties are the typed lists of all documentary and physical evidence that will be tendered at trial. Learned treatises which are expected to be used at trial shall not be admitted as exhibits. Counsel are required, however, to identify all such treatises under a separate heading on the party's exhibit list.**

**Each party's exhibits shall be numbered serially, beginning with 1, and without the inclusion of any alphabetical or numerical subparts. Adequate space must be left on the left margin of each party's exhibit list for court stamping purposes. A courtesy copy of each party's list must be submitted for use by the judge.**

**Prior to trial, counsel shall mark the exhibits as numbered on the attached lists by affixing numbered yellow stickers to plaintiff's exhibits, numbered blue stickers to defendant's exhibits, and numbered white stickers to joint exhibits. When there are multiple plaintiffs or defendants, the surname of the particular plaintiff or defendant shall be shown above the number on the stickers for that party's exhibits. Specific objections to another party's exhibits must be typed on a separate page and must be attached to the exhibit list of the party against whom the objections are raised. Objections as to authenticity, privilege, competency, and, to the extent possible, relevancy of the exhibits shall be included. Any listed document to which an objection is not raised shall be deemed to have been stipulated as to authenticity by the parties and shall be admitted at trial without further proof of authenticity. Unless otherwise noted, copies rather than originals of documentary evidence may be used at trial. Documentary or physical exhibits may not be submitted by counsel after filing of the pretrial order, except upon consent of all the parties or permission of the court. Exhibits so admitted must be numbered, inspected by counsel, and marked with stickers prior to trial.**

**Counsel shall familiarize themselves with all exhibits (and the numbering thereof) prior to trial. Counsel will not be afforded time during trial to examine exhibits that are or should have been listed.**

For the Court's convenience, the Parties' objections to the other sides' exhibits are noted in an "Objections" column on each exhibit list, rather than on a separate page attached to the exhibit list.

The parties have agreed to exchange marked exhibits by November 3, 2023.

**20.**

**The following designated portions of the testimony of the persons listed below may be introduced by deposition:**

The parties' deposition designations and counter-designations/objections are included as Attachments "J-1" and "J-2." The parties will continue to confer in advance of trial to narrow the areas of dispute for the deposition designations.

**Any objections to the depositions of the foregoing persons or to any questions or answers in the depositions shall be filed in writing no later than the day the case is first scheduled for trial. Objections not perfected in this manner will be deemed waived or abandoned. All depositions shall be reviewed by counsel and all extraneous and unnecessary matter, including non-essential colloquy of counsel, shall be deleted. Depositions, whether preserved by stenographic means or videotape, shall not go out with the jury.**

**21.**

**Attached hereto as Attachments "H-1" for the plaintiff, "H-2" for the defendant, and "H-3", etc. for other parties, are any trial briefs which counsel may wish to file containing citations to legal authority concerning evidentiary questions and any other legal issues which counsel anticipate will arise during the trial of the case. Limitations, if any, regarding the format and length of trial briefs is a matter of individual practice which shall be established by each judge.**

The parties will submit trial briefs, if any, to the Court at least fourteen (14) days before the start of the trial.

**22.**

**In the event this is a case designated for trial to the court with a jury, requests for charge must be submitted no later than 9:30 a.m. on the date on which the case is calendared (or specially set) for trial. Requests which are not timely filed and which are not otherwise in compliance with LR 51.1, will not be considered. In addition, each party should attach to the requests to charge a short (not more than one (1) page) statement of that party's contentions, covering both claims and defenses, which the court may use in its charge to the jury.**

**Counsel are directed to refer to the latest edition of the Eleventh Circuit District Judges Association's Pattern Jury Instructions and Devitt and**

**Blackmar’s Federal Jury Practice and Instructions in preparing the requests to charge. For those issues not covered by the Pattern Instructions or Devitt and Blackmar, counsel are directed to extract the applicable legal principle (with minimum verbiage) from each cited authority.**

**23.**

**If counsel desire for the case to be submitted to the jury in a manner other than upon a general verdict, the form of submission agreed to by all counsel shall be shown in Attachment “I” to this Pretrial Order. If counsel cannot agree on a special form of submission, parties will propose their separate forms for the consideration of the court.**

The Plaintiffs’ proposed verdict form is included as Attachment “I-1.” Defendants will submit their proposed verdict form in advance of the pre-trial conference.

**24.**

**Unless otherwise authorized by the court, arguments in all jury cases shall be limited to one-half hour for each side. Should any party desire any additional time for argument, the request should be noted (and explained) herein.**

The parties request that they be permitted up to one hour (for each side) for opening statements and closing arguments.

**25.**

**If the case is designated for trial to the court without a jury, counsel are directed to submit proposed finding of fact and conclusions of law not later than the opening of trial.**

**26.**

**Pursuant to LR 16.3, lead counsel and persons possessing settlement authority to bind the parties met in person on March 14, 2023, to discuss in good faith the possibility of settlement of this case. The court (\_\_\_\_) has or (\_\_\_X\_\_\_) has not discussed settlement of this case with counsel. It appears at this time that there is: (\_\_\_\_) A good possibility of settlement. (\_\_\_\_) Some**



possibility of settlement. (  X  ) Little possibility of settlement. (      ) No possibility of settlement.

**27.**

Unless otherwise noted, the court will not consider this case for a special setting, and it will be scheduled by the clerk in accordance with the normal practice of the court.

**28.**

The plaintiff estimates that it will require 7–10 days to present its evidence. The defendant estimates that it will require 5-7 days to present its evidence. The other parties estimate that it will require        days to present their evidence. It is estimated that the total trial time is 12–17 days.

Pursuant to the Court’s Order of August 3, 2023, the Court has set a trial date of November 27, 2023, and has allotted three (3) weeks for the conduct of this trial.

**29.**

**IT IS HEREBY ORDERED** that the above constitutes the pretrial order for the above captioned case (      ) submitted by stipulation of the parties or (      ) approved by the court after conference with the parties.

**IT IS FURTHER ORDERED** that the foregoing, including the attachments thereto, constitutes the pretrial order in the above case and that it supersedes the pleadings which are hereby amended to conform hereto and that this pretrial order shall not be amended except by Order of the court to prevent manifest injustice. Any attempt to reserve a right to amend or add to any part of the pretrial order after the pretrial order has been filed shall be invalid and of no effect and shall not be binding upon any party or the court, unless specifically authorized in writing by the court. **IT IS SO ORDERED** this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

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**UNITED STATES DISTRICT JUDGE**

*Signatures of counsel follow on the next page.*

Each of the undersigned counsel for the parties hereby consents to entry of the foregoing pretrial order, which has been prepared in accordance with the form pretrial order adopted by this court.

/s/ Tiana S. Mykkeltvedt

Tiana S. Mykkeltvedt

**Counsel for Plaintiffs**

/s/ Chelsea R. Mikula

Chelsea R. Mikula

**Counsel for Defendants**

**Attachment “B-1”  
Plaintiffs’ Voir Dire Questions**

1. Do you have any prejudices or biases against individuals who make claims or initiate legal proceedings?
2. Do you believe that jury verdicts are too high these days? Why?
3. Do you feel that there should be a cap or a limit on how much a jury can award in damages?
4. Do you believe that you would have a hard time awarding money damages in a case where there is only pain and suffering, and not necessarily a visible physical injury?
5. Do you believe that it is too easy for Plaintiffs to bring cases to trial?
6. Because this is a civil lawsuit, the Court will tell you that for a plaintiff to prove their case, they only need to show that something is more likely true than not—a rule called preponderance of the evidence. Is there anyone here who thinks they would have trouble finding in favor of the party that only has to show that something is more likely true than not?
7. Have you or someone close to you ever experienced memory loss from a traumatic injury?
8. Have you or someone close to you ever experienced flashbacks from a traumatic event?
9. Have you or someone close to you ever had to relive a traumatic experience from your past?
10. Does anyone here disagree that repeated trauma, like being assaulted over and over again, makes the injury worse?
11. Does anyone disagree that trauma and mental anguish from sexual assault can be different and sometimes more traumatic than other types of physical injuries, like a broken leg?

12. Have you read or seen any news coverage about sex trafficking?
13. Have you watched any documentary, TV shows or movies that involved sex trafficking?
14. Do you believe that sex trafficking is a danger to the community? Y/N
15. Do you approve of the job that President Trump did during his time in office?  
Y/N
16. At the end of this case, the Court may instruct the jury to consider certain damages. If supported by the evidence, could you award damages to compensate a victim of sexual assault for her mental anguish?
17. Punitive damages are assessed, at the discretion of the jury, to punish the defendant or set an example. If supported by the evidence, could you follow the law and award punitive damages? Or, despite what the evidence shows, who would have a difficult time awarding punitive damages against a company?
18. Are you, any family members, or close friends, members of CALA (Citizens Against Lawsuit Abuse) or any other organization favoring tort reform?

**Attachment “B-3”  
Proposed Juror Questionnaire**

**\*\*Yellow Highlight indicates that Defendants have not agreed to the inclusion of these questions. The parties are continuing to confer.**

1. Name: \_\_\_\_\_  
  
Age: \_\_\_\_\_  
  
Juror Number as on Summons: \_\_\_\_\_
2. Gender: \_\_\_\_\_ Male \_\_\_\_\_ Female \_\_\_\_\_ Other
3. What is your current marital status?  
  
Single, or Never Married  
  
Partnered  
  
Married  
  
Separated  
  
Divorced  
  
Widowed
4. What is your approximate yearly household income? \_\_\_\_\_
5. Are you a parent? Y/N
6. Where were you born and raised?  
  
Born: \_\_\_\_\_ Raised: \_\_\_\_\_
7. Is English your native language? Y/N  
  
If not, what is your native language? \_\_\_\_\_

Do you understand the English language? \_\_\_\_\_

Do you speak the English language? \_\_\_\_\_

Do you read the English language? \_\_\_\_\_

8. What city and neighborhood or area do you live in?

\_\_\_\_\_

How long have you lived there? \_\_\_\_\_

Where did you live before you moved there? \_\_\_\_\_

How long did you live there? \_\_\_\_\_

9. Do you own or rent your current residence? \_\_\_\_ Own \_\_\_\_ Rent

10. What is the last level of education you completed?

_____ Grade school or less	_____ Some college
_____ Some high school	_____ 2-Year college graduate
_____ High school graduate	_____ 4-Year college graduate
_____ Technical or business school	
_____ Post-graduate work	
_____ Professional Degree (J.D., M.D.)	

Please list the degrees (if any) you have, the schools and colleges you attended and your major area of study:

\_\_\_\_\_

\_\_\_\_\_

11. Are you currently?

_____ Employed full-time	_____ Student
_____ Employed part-time	_____ Disabled
_____ Unemployed	_____ Homemaker
_____ Retired	_____ Employed – more than one job

If you are now employed:

Name and location of employer:

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Type of business employer is in:

---

Job title:

---

Duties (describe briefly):

---

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12. Does your job involve supervising other people? Y/N  
How many?

Are you involved in the hiring and firing of other employees? Y/N

Have you ever worked in any of the following fields:

Hotel management

Landlord

Safety and Security

Law enforcement

Insurance

Risk Management

13. Is your spouse/partner currently employed? Y/N

Name of employer \_\_\_\_\_



Type of business \_\_\_\_\_

14. What is your political affiliation?

\_\_\_ Republican

\_\_\_ Democrat

\_\_\_ Libertarian

\_\_\_ Independent

\_\_\_ No Party

\_\_\_ Other Party

15. What is your political alignment?

\_\_\_ Very conservative

\_\_\_ Somewhat conservative

\_\_\_ Slightly conservative

\_\_\_ Moderate

\_\_\_ Slightly Liberal

\_\_\_ Somewhat Liberal

\_\_\_ Very Liberal

16. Have you ever had any previous experience as a juror? \_\_\_ Yes \_\_\_ No

If yes, how many times? \_\_\_\_\_

Were they civil or criminal? \_\_\_\_\_

When? \_\_\_\_\_

Briefly state the nature of the case(s) involved:

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Was the case submitted to a jury? \_\_\_\_\_ Yes \_\_\_\_\_ No

Did you participate in the deliberations? \_\_\_\_\_ Yes \_\_\_\_\_ No

Did the jury reach a verdict? \_\_\_\_\_ Yes \_\_\_\_\_ No

Were you ever a foreperson on any of these jury panels?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If civil, was the verdict for the Plaintiff or Defendant? \_\_\_\_\_

If criminal, did you find the Defendant guilty or not guilty. \_\_\_\_\_

17. Have you ever been a witness at trial (other than a divorce)? Y/N

18. Have you ever given a desposition (other than a divorce)? Y/N

19. Has a claim for money damages ever been made against you or a company you work for? Y/N

If yes, please explain:

20. Have you or someone close to you ever been diagnosed with PTSD?  
Y/N

21. Have you or someone close to you been diagnosed with clinical  
depressive disorder? Y/N

22. Have you or someone close to you been diagnosed as bi-polar? Y/N

23. Have you or someone close to you been diagnosed with anxiety? Y/N

24. Have you or someone close to you suffered from addiction to drugs or alcohol? Y/N

25. Have you ever served in the military? Y/N

26. Have you or any of your family members ever been a member of a local union? Y/N

27. Have you, any family members, or friends ever worked for or applied for a job with any law enforcement agency? Y/N

IF YES, who and for which agency?

28. Have you or anyone you know ever worked for an attorney or law firm? Y/N

IF YES, who and what was the name of the attorney or law firm?

29. Have you or someone close to you ever been a victim of a serious crime? Y/N

30. Have you ever been a victim of domestic violence? Y/N

31. Have you or anyone close to you been sexually assaulted? Y/N

32. Were you, or has anyone close to you, abused as a child? Y/N

33. Have you, a close friend, or family member ever been accused of:

A. Threatening or intimidating another person? Y/N

B. Holding a person against his or her will? Y/N

C. Committing any kind of physical, emotional, or domestic abuse? Y/N

D. Committing sexual abuse? Y/N

E. Committing a sexual assault? Y/N

F. Committing a violent crime? Y/N

Please give a brief description of any “yes” responses above.

[REDACTED]

[REDACTED]

34. Have you read about or seen any news coverage about sex trafficking?  
Y/N

35. Have you or someone close to you been involved in the commercial sex trade? Y/N

36. Please list the newspapers, magazines, professional journals, or periodicals you subscribe to or read regularly.

[REDACTED]

[REDACTED]

**Attachment “C”  
Plaintiffs’ Outline of the Case**

Plaintiffs allege injuries and damages arising from the sex trafficking of Jane Doe 1, Jane Doe 2, Jane Doe 3, and Jane Doe 4 at 2200 Corporate Plaza, Smyrna, Georgia, 30080 (the “Smyrna Red Roof”) and the sex trafficking of Jane Doe 1, Jane Doe 2, and Jane Doe 3 at 1960 North Druid Hills Road NE, Atlanta, Georgia, 30329 (the “Buckhead Red Roof”) from 2010 to early 2017.

Plaintiffs specifically allege that Defendants controlled the Smyrna and Buckhead Red Roofs and profited from sex trafficking at both locations, making them liable for damages. Prior to December 14, 2012, FMW acted as the franchisee owner of the Smyrna Red Roof. During the relevant time period, RRI III acted as the franchisee owner of the Buckhead Red Roof. RRI West acted as the manager of the Smyrna and Buckhead Red Roofs. Red Roof Franchising had franchise agreements with FMW and RRI III and acted as the franchisor for the Smyrna and Buckhead Red Roofs. RRI owns Red Roof Franchising.

Plaintiffs assert that (1) Defendants knew or should have known that the Smyrna and Buckhead Red Roofs violated the Trafficking Victims Protection Reauthorization Act, 18 U.S.C. 1595(a) (“TVPRA”) and knowingly benefited from participation in ventures that it knew or should have known engaged in sex trafficking in violation of the TVPRA; (2) Defendants knowingly permitted the

Smyrna and Buckhead Red Roofs to be used for prostitution and sex trafficking in violation of the Georgia Racketeer Influenced and Corrupt Organizations Act (“Georgia RICO”), O.C.G.A. § 16-14-4(c) and O.C.G.A. § 16-14-4(a), and (3) Defendants knew or should have known of the foreseeable risk of sex trafficking, prostitution, and other crimes at the Smyrna and Buckhead Red Roof Inns and are liable to Plaintiffs for their negligence under Georgia law in not taking steps to address the risk.

Smyrna Red Roof Defendants, FMW, RRI West, RRI, and Red Roof Franchising negligently failed to keep the Smyrna Red Roof location safe and negligently failed to protect their invitees adequately and properly in breach of their duty of care. These Smyrna Red Roof Defendants were negligent, and their negligence proximately caused Plaintiffs’ injuries by:

- a. Negligently violating O.C.G.A. § 51-3-1 by failing to use ordinary care to keep the premises safe;
- b. Negligently violating O.C.G.A. § 41-1-1 by creating and maintaining a nuisance;
- c. Negligently failing to provide appropriate and effective security personnel during Plaintiffs’ trafficking at the hotel;
- d. Negligently failing to properly inspect and maintain the premises;
- e. Negligently failing to properly train and supervise their employees

regarding sex trafficking at the hotel;

- f. Negligently failing to properly retain, hire, train, and supervise said employees;
- g. Negligently failing to select a franchisee qualified to operate the hotel in a safe and secure manner;
- h. Negligently failing to ensure business policies, systems, and security were adequately followed and implemented;
- i. Negligently failing to inspect, patrol, or appropriately monitor the property;
- j. Negligently failing to remediate a long history of crime at the Smyrna Red Roof and the area nearby;
- k. Negligently failing to warn invitees of known hazards at the property; and
- l. Negligently representing to invitees that the property was safe.

Buckhead Red Roof Defendants, RRI III, RRI West, RRI, and Red Roof Franchising negligently failed to keep the Buckhead Red Roof location safe and negligently failed to protect their invitees adequately and properly in breach of their duty of care. These Buckhead Red Roof Defendants were negligent, and their negligence proximately caused Plaintiffs' injuries by:

- m. Negligently violating O.C.G.A. § 51-3-1 by failing to use ordinary care to keep the premises safe;
- n. Negligently violating O.C.G.A. § 41-1-1 by creating and maintaining a nuisance;
- o. Negligently failing to provide appropriate and effective security personnel during Plaintiffs' trafficking at the hotel;
- p. Negligently failing to properly inspect and maintain the premises;
- q. Negligently failing to properly train and supervise their employees regarding sex trafficking at the hotel;
- r. Negligently failing to properly retain, hire, train, and supervise said employees;
- s. Negligently failing to ensure business policies, systems, and security were adequately followed and implemented;
- t. Negligently failing to inspect, patrol, or appropriately monitor the property;
- u. Negligently failing to remediate a long history of crime at the Buckhead Red Roof and the area nearby;
- v. Negligently failing to warn invitees of known hazards at the property; and
- w. Negligently representing to invitees that the property was safe.



Plaintiffs will seek general non-economic damages, under the TVPRA, Georgia RICO, and Georgia negligence including recovery for their past, present, and future physical and mental harm and pain and suffering in a range of \$2 million to \$50 million per Plaintiff to be determined by the enlightened conscience of the jury. Further, any damages awarded by the jury to Plaintiffs for Defendants' violations of Georgia RICO will be trebled (i.e., an amount that is three times the compensatory damages award) as a matter of law.

Plaintiffs also seek punitive damages under the TVPRA, Georgia RICO, and Georgia negligence in an amount to be determined by the jury. Plaintiffs intend to request between \$10 million and \$100 million per Plaintiff in punitive damages.

Finally, Plaintiffs will seek to recover their reasonable attorney's fees, costs, and expenses under the TVPRA, Georgia RICO, O.C.G.A. § 13-6-11, O.C.G.A. § 9-11-68(e) and any other fee-shifting authority.

Plaintiffs reserve the right to pursue all damages allowed under Georgia and Federal law for their injuries and Defendants' unlawful actions.

Plaintiffs incorporate the representative caselaw contained in their response to Defendants' motions for summary judgement. That case law includes but is not limited to:

Representative caselaw

- *Dorsey v. State*, 279 Ga. 534, 540 (2005)

- *Williams General Corp. v. Stone*, 279 Ga. 428, 429 (2005)
- *Coggins v. State*, 275 Ga. 479, 480 (2002);
- *Whaley v. State*, 343 Ga. App. 701, 704 (2017)
- *Clemmons v. State*, 361 Ga. App. 666 (2021).
- *Fitts v. State*, 312 Ga. 134, 142 (2021).
- *Cox v. Adm'r U.S. Steel & Carnegie*, 17 F.3d 1386, 1398 (11th Cir.)
- *Fitzgerald v. State*, 10 Ga. App. 70, 77 (1911).
- *Peters v. State*, 72 Ga. App. 157, 158 (1945); *see*
- *Shealy v. State*, 142 Ga. App. 850, 850 (1977)
- *Brannan v. State*, 43 Ga. App. 231 (1931)
- *Ward v. State*, 22 Ga. App. 786 (1918)
- *Platt v. State*, 335 Ga. App. 49, 53 (2015)
- *Basil v. State*, 22 Ga. App. 765 (1918)
- *Whaley v. State*, 343 Ga. App. 01, 704 (2017)
- *Lemery v. State*, 330 Ga. App. 623, 623 (2015)
- *Bridge v. Phoenix Bond & Indem. Co.*, 553 U.S. 639, 654 (2008)
- *Anza v. Ideal Steel Supply Corp.*, 547 U.S. 451, 461 (2006)
- *InterAgency v. Danco*, 203 Ga. App. 418, 424 (1992)
- *S. Intermodal Logistics, Inc. v. D.J. Powers Co.*, 10 F.Supp.2d 1337, 1354

(S.D. Ga. 1998)

- *United States v. Pipkins*, 378 F.3d 1281, 1291 (11th Cir. 2004), *vacated on other grounds by* 544 U.S. 902
- *Pasha v. State*, 273 Ga. App. 788, 790 (2005)
- *Akintoye v. State*, 340 Ga. App. 777, 781 (2017)
- *Brown v. State*, 177 Ga. App. 284, 295 (1985)
- *Studivant v. State*, 309 Ga. 650, 651 (2020)
- *Sedima, S.P.R.L. v. Imrex Co.*, 473 U.S. 479, 499 (1985)
- *Reaugh v. Inner Harbour Hosp.*, 214 Ga. App. 259, 264 (1994)
- *Doe#1 v. Red Roof Inns, Inc.*, 21 F.4th 714, 723 (11th Cir. 2021)
- *United States v. Prather*, 205 F.3d 1265, 1270 (11th Cir. 2000)
- *United States v. Perez*, 698 F.2d 1168, 1171 (11th Cir. 1983)
- *Allen v. Bd. of Pub. Educ.*, 495 F.3d 1306 (11th Cir. 2007)
- *Matt v. Days Inns of Am., Inc.*, 212 Ga. App. 792, 794–95 (1994)
- *M.A. v. Wyndham Hotel & Resorts, Inc.*, 425 F.Supp.3d 959, 968 (S.D. Ohio 2019)
- *J.G. v. Northbrook Indus., Inc.*, 2022 WL 4482735, at \*6–7 (N.D. Ga. Aug. 2, 2022)
- *G.W. v. Northbrook Indus., Inc.*, 2022 WL 1644923, at \*1–4 (N.D. Ga. May

24, 2022)

- *Lundstrom v. Choice Hotels Int’l, Inc.*, 2021 WL 5579117, at \*4 (D. Colo. Nov. 30, 2021)
- *S.Y. v. Choice Hotels Int’l, Inc.*, 2021 WL 1610101, at \*4 (M.D. Fla. Apr. 26, 2021)
- *Frazier v. Godley Park Homeowners Ass’n, Inc.*, 342 Ga. App. 608, 609 (2017)
- *McGarity v. Hart Elec. Membership Corp.*, 307 Ga. App. 739, 744 (2011)
- *Handberry v. Stuckey Timberland, Inc.*, 345 Ga. App. 191, 195 (2018)
- *TGM Ashley Lakes, Inc. v. Jennings*, 264 Ga. App. 456, 462 (2003) (*en banc*)
- *Walker v. Aderhold Props., Inc.*, 303 Ga. App. 710, 713 (2010) (*en banc*)
- *Six Flags Over Ga. II, L.P. v. Martin*, 335 Ga. App. 350, 361 (2015)
- *Wade v. Findlay Mgmt., Inc.*, 253 Ga. App. 688, 690 (2002)
- *Wallace v. Boys Club*, 211 Ga. App. 534, 536 n.2 (1993)
- *Gustin v. Nicoll*, 824 F. App’x 875, 877–78 (11th Cir. 2020)
- *Kahn v. Visador Holding Corp.*, No. 2:07-cv-73, 2009 WL 10668538, \*\*2–3 (N.D. Ga. Jul. 17, 2009)
- *Marietta v. Godwin*, 106 Ga. App. 113, 116–17 (1962)

- *German Am. Mut. Life Ass'n v. Farley*, 102 Ga. 720, 737 (1897)
- *Shadow v. Fed. Exp. Corp.*, 359 Ga. App. 772, 779 (2021)
- *Sturbridge Partners v. Walker*, 267 Ga. 785 786(1997)
- *Remediation Res., Inc. v. Balding*, 281 Ga. App. 31 (2006).
- *Georgia CVS Pharmacy v. Carmichael*, 362 Ga. App. 59 (2023)

**Attachment “D”**  
**Defendants’ Statement of the Case**

Defendants deny that they are liable to Plaintiffs Jane Does 1-4 for sex trafficking that allegedly occurred at various hotels, over different periods of time, by different traffickers, under any theory of liability, including negligence, violations of the Trafficking Victims Protection Reauthorization Act, 18 U.S.C. 1595(a) (“TVPRA”), or pursuant to Georgia’s civil RICO statute, O.C.G.A. § 16-14-4 (a) & (c) (GA RICO). Plaintiffs allege that that they were trafficked at multiple hotels, including two hotel properties under the Red Roof brand: (1) 2200 Corporate Plaza, Smyrna, Georgia 30080 (Smyrna property); and (2) 1960 N. Druid Hills, Atlanta, Georgia 30329 (Buckhead property). Prior to December 14, 2012, the Smyrna property was owned by Defendant FMW RRI NC, LLC and operated by Defendant RRI West Management, LLC (RRI West). On December 14, 2012, the Smyrna property was purchased by an independent third-party franchisee, former Defendant Varahi Hotels, LLC (Varahi), who entered into a franchise agreement with Red Roof Franchising (RRF) to operate the Smyrna property as a franchise Red Roof location. At all relevant times, the Buckhead location was owned by RRI III, LLC and was operated by RRI West. Red Roof Inns, Inc. employed certain employees at the Buckhead property, and at the Smyrna property prior to December 14, 2012.

Any alleged injuries and damages incurred by Plaintiffs were not proximately caused by any acts or omissions of Defendants, and instead were caused by the acts or omissions of others for whom Defendants bear no legal responsibility, including: Plaintiffs' various alleged traffickers; the alleged purchasers of sex and sexual acts allegedly performed by Plaintiffs (John Doe Johns); individuals who allegedly provided help and assistance to Plaintiffs' traffickers (John and Jane Doe Accomplices); owners and operators of other hotels where Plaintiffs were allegedly trafficked; online websites where Plaintiffs were allegedly subjected to online advertising for the sale of illegal commercial sex; Varahi Hotels, LLC (Varahi), the franchisee and owner/operator of the Smyrna location starting on December 14, 2012; and security companies providing security services at the Smyrna and Buckhead locations during some or all of the time periods of Plaintiffs' alleged trafficking. The acts and omissions of these third parties are superseding/intervening actions such that the causal chain is broken between any act or omission by Defendants and Plaintiffs' alleged injuries.

Each Plaintiff's alleged injuries and damages were caused by her own intentional, negligent, or criminal conduct. Each Plaintiff assumed the risk of injury. Plaintiffs' alleged injuries and damages are fully or partially due to her own pre-existing or subsequent conditions and events unrelated to the alleged trafficking at Red Roof properties, including but not limited to health or mental health conditions,

physical, mental, and sexual abuse, childhood or other trauma, criminal history, and drug use, abuse, and dependence, etc.

Plaintiffs' negligence claims are time barred by the two-year statute of limitations, which accrued on the date that the alleged sex trafficking occurred. Likewise, one or more Plaintiffs' GA RICO claims are time-barred by the five-year statute of limitations.

Defendants did not owe or breach any legal duty to Plaintiffs, and had no knowledge of sex trafficking with respect to the individual Plaintiffs and/or their alleged traffickers at the Smyrna or Buckhead properties, and had no knowledge, nor should they have known that each Plaintiff specifically was being trafficked. The Smyrna property was not owned, operated, or controlled by any Defendant after it was franchised by former Defendant, Varahi Hotels, LLC (Varahi) on December 14, 2012. Varahi was neither an actual nor apparent agent of any Defendants, and Plaintiffs have expressly disclaimed any claims against or liability of Defendants arising out of the acts or omissions of Varahi and its employees and agents.

The intervening criminal acts of the third-party traffickers, John Doe Johns, and John/Jane Doe Accomplices as alleged by Plaintiffs were not reasonably foreseeable, because Defendants had no knowledge of sex trafficking with respect to the individual Plaintiffs and/or their alleged traffickers at the Smyrna or Buckhead properties. Accordingly, Defendants owed no duty to protect Plaintiffs from



unforeseeable criminal acts of their traffickers John Doe Johns, or the John/Jane Doe Accomplices. Additionally, Plaintiffs had superior knowledge of the specific dangers of the commercial sex trade as compared to Defendants.

Defendants did not knowingly and directly participate in a venture with Plaintiffs' traffickers, John Doe Johns, or the John/Jane Doe Accomplices that Defendants knew or should have known was a violation of the TVPRA. Defendants, including RRI West, did not knowingly benefit from Plaintiffs' alleged trafficking, and Defendants did not know, nor should they have known, that each individual Plaintiff was being trafficked.

Defendants did not violate GA RICO, because they were not involved in any pattern of racketeering activity, and did not intend that any Plaintiff would be the targeted and intentional victim of any predicate acts. Plaintiffs' injuries are not the direct result of any predicate act targeted toward her such that she was the intended victim. Defendants did not directly and knowingly engage in trafficking an individual for sexual servitude or keeping a place of prostitution in violation of GA RICO, and did not intentionally encourage, aid, or abet another to commit those crimes. Defendants did not knowingly and willfully join a conspiracy with a common plan or purpose to commit two or more predicate acts in violation of GA RICO.

Any act or omission allegedly committed by an agent or employee of Defendants, which is alleged to constitute evidence of negligence, a violation of the TVPRA, or of GA RICO, was not committed within the course and scope of employment, and was not committed on behalf of any Defendant. Plaintiffs' claims are barred or limited by the doctrines of acquiescence, waiver, estoppel, or laches. Furthermore, Plaintiffs have released, settled, entered into accord and satisfaction, or otherwise compromised their claims, and accordingly, their claims are limited or barred as a matter of law.

**LAW TO BE RELIED UPON BY DEFENDANTS:**

Defendants may rely on the statutes and representative case law listed below, and similar cases, and expressly incorporate by reference as if fully rewritten herein, all statutes and representative case law cited in any parties' summary judgment briefing.

- 18 U.S.C. § 1591, *et. seq.*
- 42 U.S.C. § 2000a(a)
- O.C.G.A. § 13-4-10
- O.C.G.A. § 13-5-7
- O.C.G.A. § 16-5-46
- O.C.G.A. § 16-6-10
- O.C.G.A. § 16-6-9

- O.C.G.A. § 23-1-25
- O.C.G.A. § 24-14-29
- O.C.G.A. § 43-21-3
- O.C.G.A. § 51-3-1
- O.C.G.A. § 51-11-7
- O.C.G.A. § 51-12-5.1
- O.C.G.A. § 51-12-33
- O.C.G.A. § 9-3-33
- O.C.G.A. § 51-12-11
- O.C.G.A. § 16-14-1, *et. seq.*
- *A.B. v. Hilton Worldwide Holdings Inc.*, 484 F. Supp. 3d 921 (D. Or. 2020)
- *A.B. v. Marriott Int'l, Inc.*, 455 F. Supp. 3d 171, 182 (E.D. Pa. 2020)
- *A.B. v. Wyndham Hotels & Resorts, Inc.*, 532 F. Supp. 3d at 1018 (D. Or. 2021)
- *A.D. v. Holistic Health Healing Inc.*, No. 2:22-CV-641-JES-NPM, 2023 WL 2242507 (M.D. Fla. Feb. 27, 2023)
- *Ahn v. State*, 631 S.E.2d 711 (Ga.App. 2006)
- *Allum v. Valley Bank*, 849 P.2d 297 (Nev. 1993)
- *Anderson v. Turton Dev.*, 225 Ga. App 270, 271, 274 (1997)
- *Atlanta Gas Light Co. v. Jennings*, 86 Ga. App. 868 (1952)
- *B.M. v. Wyndham Hotels & Resorts, Inc.*, No. 20-cv-00656-BLF, 2020 WL 4368214 (N.D. Cal. July 30, 2020)

- *Baillie Lumber Co. v. Thompson*, 279 Ga. 288 (2005)
- *Birdwell v. State*, 146 S.E.2d 374 (Ga.App. 1965)
- *Blakely v. Johnson*, 220 Ga. 572, 140 S.E.2d 857 (1965)
- *C.C. v. H.K. Grp. of Co., Inc.*, No. 1:21-CV-1345-TCB, 2022 WL 467813 (N.D. Ga. Feb. 9, 2022)
- *Carlson v. BRGA Assocs., LLC*, 82 F. Supp. 3d 1333 (S.D. Ga. 2015)
- *Cox v. Mayan Lagoon Estates Ltd.*, 734 S.E.2d 883 (Ga. Ct. App. 2012)
- *DaimlerChrysler Motors Co. v. Clemente*, 294 Ga. App. 38 (2008).
- *Doe #1 v. Red Roof Inns, Inc.*, 21 F.4th 714 (11th Cir. 2021)
- *Doe v. GTE Corp.*, 347 F.3d 655 (7th Cir. 2003)
- *Does 1-6 v. Reddit, Inc.*, 51 F.4th 1137 (9th Cir. 2022)
- *Duvall v. Cronic*, 820 S.E.2d 780 (Ga. Ct. App. 2018)
- *Fitts v. State*, 312 Ga. 134 (2021)
- *G.G. v. Salesforce.com, Inc.*, No. 22-2621, 2023 WL 4944015 (7th Cir. Aug. 3, 2023)
- *G.W. v. Northbrook Indus., Inc.*, No. 1:20-CV-05232-JPB, 2022 WL 1644923 (N.D. Ga. May 24, 2022)
- *Garner v. Driver*, 155 Ga. App. 322, 270 S.E.2d 863 (1980)
- *Geiss v. Weinstein Co. Holdings, LLC, et al.*, 383 F.Supp.3d 156 (S.D.N.Y. 2019)
- *Gentry v. Volkswagen of America*, 238 Ga. App. 785 (1999).
- *Goldstein, Garber & Salama, LLC v. J.B.*, 300 Ga. 840 (2017)
- *H.G. v. Inter-Cont'l Hotels Corp.*, 489 F. Supp. 3d 697 (E.D. Mich. 2020)

- *J.B. v. G6 Hosp., LLC*, No. 19-cv-07848-HSG, 2020 WL 4901196 (N.D. Cal. Aug. 20, 2020)
- *J.C. v. I Shri Khodiyar, LLC*, 624 F. Supp. 3d 1307 (N.D. Ga. 2022)
- *J.L. v. Best W. Int'l, Inc.*, 521 F. Supp. 3d 1048 (D. Colo. 2021)
- *Kids R Kids Intl, Inc. v. Cope*, 330 Ga. App. 891 (2015)
- *King v. Georgia Dep't of Corr.*, 347 Ga. App. 606, 820 S.E.2d 445 (2018)
- *L.H. v. Marriot Int'l, Inc.*, 604 F. Supp. 3d 1346 (S.D. Fla. 2022)
- *Leo v. Waffle Howe, Inc.*, 298 Ga. App. 838 (2009)
- *New Star Realty, Inc. v. Jungang PRI USA, LLC*, 346 Ga. App. 548 (2018);
- *Nicholson v. Windham et al.*, 571 S.E.2d 466 (Ga. Ct. App. 2002)
- *Noble v. Weinstein*, 335 F. Supp. 3d 504 (S.D.N.Y. 2018)
- *Reaugh v. Inner Harbour Hosp.*, 447 S.E.2d 617 (Ga. Ct. App. 1994)
- *Rent to Own, Inc. v. Bragg*, 248 Ga. App. 130 (2011)
- *Rice v. Six Flags Over Georgia*, 257 Ga. App. 864, 572 S.E.2d 322 (2002)
- *S.J. v. Choice Hotels Int'l, Inc.*, 473 F. Supp. 3d 147 (E.D.N.Y. 2020)
- *Schlotzsky's, Inc. v. Hyde*, 245 Ga. App. 888 (2000)
- *Summit Auto. Grp., LLC v. Clark*, 298 Ga. App. 875 (2009);
- *Sun Trust Banks, Inc. v. Killebrew*, 266 Ga. 109 (1995)
- *Travis v. QuikTrip Corp.*, 339 Ga. App. 551 (2016)
- *Wade v. McDade*, 67 F.4th 1363 (11th Cir. 2023)
- *Waters v. Steak & Ale of Ga.*, 241 Ga. App. 709 (2000)

- *Whelan v. Moone*, 242 Ga. App. 795, 531 S.E.2d 727 (2000)
- *Wilks v. Overall Const. Inc.*, S.E.2d 320 (Ga. Ct. App. 2009)
- *Wylie v. Denton*, 746 S.E.2d 689 (Ga. Ct. App. 2015)

**ATTACHMENT F-1 – PLAINTIFFS’ WITNESS LIST**

<b>Witness</b>	<b>Address/Contact Information</b>	<b>May or Will Call</b>
Jane Doe 1/Jane Doe 1’s personal representative (TBD)	Contact through Plaintiffs’ counsel	May
Jane Doe 2	Contact through Plaintiffs’ counsel	Will
Jane Doe 3	Contact through Plaintiffs’ counsel	Will
Jane Doe 4	Contact through Plaintiffs’ counsel	Will
Anique Whitmore	3500 Lenox Road, Suite 1500 Atlanta, GA 30326 (404) 419-2138	May
Dr. David Williamson	Walter Reed National Military Medical Center 8901 Rockville Pike Bethesda, MD 20889 -and- 9710 Traville Gateway Drive, No. 296 Rockville, MD 20850 (410) 463-0560	May
Dr. Melanie Bliss	111 North McDonough Street Decatur, GA 30030 (404) 387-0780	May
Allan Tallis	11919 Edgestone Road Dallas, TX 75230 (972) 960-8450	May
Andrew Alexander	100 Main Street North St. Petersburg, FL 33716 (216) 496-9122	May

<b>Witness</b>	<b>Address/Contact Information</b>	<b>May or Will Call</b>
Vanessa Cole	1393 Tysons Corner Marietta, GA 30062 (770) 313-5756	May
Glenn Galbraith	Contact through defense counsel	May
Vickie Lam	Contact through defense counsel	May
George Limbert	Contact through defense counsel	May
Marina MacDonald	Contact through defense counsel	May
Tom McElroy	83 River Rise Way Inlet Beach, FL 32461 (901) 488-8135	May
Jay Moyer	1329 Moher Boulevard Franklin, TN 37069	May
John Park	Contact through defense counsel	May
Greg Stocker	Contact through defense counsel	May
Vince Vittatoe	Contact through defense counsel	May
Michelle Wehrle	Contact through defense counsel	May
Brianne Austin	Contact through defense counsel	May
Forrest Castille	1408 Adams Lake Boulevard SE Atlanta, GA 30339 (762) 359-1595	May
Brenda Conner	880 Rock Street NW Apartment 82 Atlanta, GA 30314 (404) 438-4794	May
Sirin Sirinsapasitti	6546 Deerings Lane Norcross, GA 30092 (678) 641-8973	May



<b>Witness</b>	<b>Address/Contact Information</b>	<b>May or Will Call</b>
Monica Nash Hamilton	7334 Exeter Court Riverdale, GA 30296 (318) 228-5986	May
Michael Thomas	851 E 169 <sup>th</sup> Street, Apt C Bronx, NY 10459 (972) 800-8525	May
Bharat Patel	3572 Guildhall Trail Marietta, GA 30066	May
C.A.	Contact through Plaintiffs' counsel	May
M.B.	Contact through Plaintiffs' counsel	May
T.H.	Contact through Plaintiffs' counsel	May
E.H.	Contact through Plaintiffs' counsel	May
W.K.	Contact through Plaintiffs' counsel	May
R.K.	Contact through Plaintiffs' counsel	May
M.M.	Contact through Plaintiffs' counsel	May
A.F.	Contact through Plaintiffs' counsel	May
K.P.	Contact through Plaintiffs' counsel	May
R.P.	Contact through Plaintiffs' counsel	May
D.P.	Contact through Plaintiffs' counsel	May
Tiffany Martin	2140 Deans Landing Lawrenceville, GA 30043 (678) 754-3404	May
Rose Marie Martin	13118 Caroline Street Cerritos, CA 90703 (678) 420-8282	May

<b>Witness</b>	<b>Address/Contact Information</b>	<b>May or Will Call</b>
Mike Smith	3815 Westwick Trace, NW Kennesaw, GA 30152 (404) 915-0095	May
Kim Smith	3815 Westwick Trace, NW Kennesaw, GA 30152 (678) 471-5629	May
Joyce Weems	290D Winding River Drive Sandy Springs, GA 30350 (770) 380-8099	May
Caleb Estes	403 Sundance Circle Dacono, CO 80514 (423) 895-2422	May
Joy Valerio	103 Landing Road Brunswick, GA 31520 (678) 914-9324	May
Maribeth Krawczyk	183 Amohi Way Loudon, TN 37774	May
Michelle Sarkisian	315 West Country Drive Duluth, GA 30097 (770) 235-8402	May
Susan Norris	1750 Powder Springs Road Suite 190, Box 112 Marietta, GA 30064 (678) 388-9551	May

<b>Witness</b>	<b>Address/Contact Information</b>	<b>May or Will Call</b>
Kimberly McDevitt	Sunrise Ministries PO Box 801303 Acworth, GA 30101 (678) 379-5194	May
Kasey McClure	P.O. Box 82685 Conyers, GA 30012 (404) 312-6793	May
Ann Bailey	P.O. Box 82685 Conyers, GA 30012 (470) 362-8808	May
Jeff Thomas	10 Dodd Trail Greenville, SC 29605 (404) 314-8742 (404) 468-7277	May
Joe Fonseca	971 Deron Drive Lawrenceville, GA 30044 (678) 682-0575	May
Officer Brian Graham Cobb County Police	1665 Windchase Dr. Marietta, GA 30064 (404) 451-0901	May
Officer Brian C. Moore Cobb County Police	1149 Roselawn Lane SE Marietta, GA 30067 (404) 545-5372	May
Officer John Clifford Brookhaven Police	4045 George Busbee Parkway, #6304 Kennesaw, GA 30144 (770) 843-4112	May

<b>Witness</b>	<b>Address/Contact Information</b>	<b>May or Will Call</b>
Officer Lonnie D. Green Cobb County Police	2800 Camp Creek Parkway, L-5 Atlanta, GA 30337 (334) 354-4080	May
Tiana Mykkeltvedt (solely as to attorneys' fees and expenses)	Bondurant, Mixson & Elmore, LLP 1201 West Peachtree Street, N.W., Suite 3900 Atlanta, GA 30309 (404) 881-4144	May
Pat McDonough (solely as to attorneys' fees and expenses)	Andersen, Tate & Carr, P.C. 1960 Satellite Boulevard, Suite 4000 Duluth, GA 30097 (678) 518-6859	May
Any witness identified on the Defendants' witness list	N/A	N/A

### **Summary of Expert Witness Testimony**

The following is a summary of the expected testimony of each of Plaintiffs' expert witnesses:

1. Anique Whitmore: Ms. Whitmore will testify about the psychological dynamics involved in sex trafficking, including the psychology behind common behaviors seen in victims of sex trafficking. She will also address other aspects of sex trafficking that may be unfamiliar to the jury. And she will also testify about how these dynamics have manifested in the Plaintiffs' specific trafficking experience, as well as other issues addressed in her expert report served on or about September 6, 2022. Ms. Whitmore may also serve to rebut the testimony of defense expert Dr. Matthew Norman.

2. Dr. Melanie Bliss: Dr. Bliss will testify about the neurobiology of trauma, the effects of trauma on memory, and common dynamics in repeated sexual assault. She will also address other issues identified in her expert report of September 6, 2022.
3. Dr. David Williamson: Dr. Williamson will testify about the psychiatric conditions of the Plaintiffs, including that the Plaintiffs suffer from psychiatric issues as a result of the traumatic experiences endured while being trafficked for sex, along with other issues addressed in his September 6, 2022 expert report. Dr. Williamson may also serve to rebut the testimony of defense expert Dr. Matthew Norman.
4. Alan L. Tallis: Mr. Tallis will testify about the standard of care a reasonable hotelier should exercise in the face of known signs of prostitution and sex trafficking, including that these signs of trafficking have been known in the hotel industry for decades. He will also opine regarding the Defendants' failure to take sufficient steps to address prostitution and sex trafficking occurring at the two hotels at issue in this case and beyond. He will also address other issues identified in his September 6, 2022 expert report. And he may serve to rebut the testimony of defense expert Greg Bristol.

**ATTACHMENT F-2**  
**Defendants' Fact Witness List**

At trial, Defendants will call the following fact witness:

1. Glenn Galbraith, can be contacted through counsel for Red Roof Inns

Defendants may call the following fact witnesses:

2. Jane Doe 1, n/a
3. Jane Doe 2, 4613 Pam Circle, SE, Acworth, GA 30102
4. Jane Doe 3, 105 Briarwood Drive, Apt. 1, Brunswick, GA 31525
5. Jane Doe 4, 730 N. Eastman Road, Apt. 3, Kingsport, TN 37664
6. Meghan Harrsch, 516 Bluff Ct., Woodstock, GA 30188
7. Michael Beene, 515 Stedford Lane, Duluth, GA 30097
8. Anthony Crumbley, 373 Lexington Dr., Lawrenceville, GA
9. Tradelle Lacy, 2802 Fullers Alley, Kennesaw, Georgia
10. Andrew Alexander, 100 Main Street North, St. Petersburg, FL 33716
11. Vanessa Cole, 1393 Tysons Corner, Marietta, Georgia 30062
12. Monica Hamilton, Atlanta, Georgia
13. Vickie Lam, 2144 E Walnut Creek Pkwy, West Covina, CA 91791
14. George Limbert, 104 Kastlekove Dr., Lewis Center, OH 43035
15. Marina MacDonald, can be contacted through counsel for Red Roof Inns
16. James Moyer, 1329 Moher Blvd., Franklin, Tennessee 37069
17. John Park, can be contacted through counsel for Red Roof Inns
18. Gregory Stocker, can be contacted through counsel for Red Roof Inns
19. Vincent Vittatote, McKinney, Texas
20. Michelle Wehrle, can be contacted through counsel for Red Roof Inns
21. Bernard Mitchell, 3705 Meadow Vista Trail, Lithonia, GA 30038
22. Robert Allen, 92 Fairwind Court, Stone Mountain, GA 30083
23. Ella Bowen, 2000 Mallory Ln, St. 130, Franklin, TN 37067
24. Bob Patel, 2200 Corporate Plaza, Smyrna, GA 30080
25. Rita Patel, 2200 Corporate Plaza, Smyrna, GA 30080
26. Rakesh Patel, 2200 Corporate Plaza, Smyrna, GA 30080
27. Dorraine Lallani, 2011 Larimer Point Crt, Sugar Land, TX 77479
28. President and/or Custodian of records for Banneret Security, Inc., 160 Clairemont Ave, Suite 200, Decatur, GA 30030
29. President and/or Custodian of records for B.E.S.T., Inc. d/b/a Best Security, P.O. Box 961774, Riverdale, GA 30274

30. Custodian of records for Holston Medical Group, 2323 N John Dennis Hwy, Kingsport, TN 37660
31. Custodian of records for Wellstar Kennestone, 677 Church Street NE Marietta, GA 30060
32. Custodian of records for Mercy Ministry, 714-1 NW Broad St., Lyons, GA 30436
33. Custodian of records for Indian Path Medical Center, 2000 Brookside Dr., Kingsport, TN 37660
34. Custodian of records for Appalachian Emergency Physicians, 1501 W Elk Ave., Elizabethton, TN 37643
35. Custodian of records for Johnson City Medical Center, 400 North State of Franklin Road, Johnson City, TN 37604
36. Custodian of records for Breakthrough Recovery Outreach, LLC, 3648 Chamblee Tucker Rd., Chamblee, GA 30341
37. Custodian of records for Midtown Urology, 1924 Piedmont Road NE, Atlanta, GA 30324
38. Custodian of records for Wellspring Living, 1040 Boulevard SE, Suite M, Atlanta, GA 30312
39. Custodian of records for Peachford Behavioral Health Systems or Atlanta, 2151 Peachford Rd, Atlanta, GA 30338
40. Custodian of records for Shepard Center, 2020 Peachtree Road NW, Atlanta, GA 30309
41. Custodian of records for Mercy Multiplied, P.O. Box 111060, Nashville, TN 37222
42. Custodian of records for Roswell Police Department, 39 Hill Street, Roswell, GA 30075
43. Custodian of records for Cobb County Police Department, 545 Fairground ST SE Unit 101, Marietta, GA 30060
44. Custodian of records for Sandy Springs Police Department, 7840 Roswell Rd #301, Sandy Springs, GA 30350
45. Custodian of records for LabCorp, 531 S Spring St., Burlington, NC 27215
46. Custodian of records for Emory St. Joseph's Hospital, 2801 Dekalb Medical Parkway, Lithonia, GA 30058
47. Custodian of records for Gwinnett County Sheriff's Office, 2900 University Parkway, Lawrenceville, GA 30043
48. Custodian of records for Baton Rouge Police Department, 233 Saint Louis Street, Room B54, Baton Rouge, LA 70802

49. Custodian of records for DeKalb County Court, 556 North McDonough Street, Ground Floor, Decatur, GA 30030
50. Custodian of records for Deuser & Associates, 2500 Starling St STE 402, Brunswick, GA 31520
51. Custodian of records for Wellstar Douglas Hospital, 8954 Hospital Dr, Douglasville, GA 30134
52. Custodian of records for Fulton County Holcomb Bridge Middle School, 6201 Powers Ferry Road NW, Atlanta, GA 30339
53. Custodian of records for Fulton County Centennial High School, 6201 Powers Ferry Road NW, Atlanta, GA 30339
54. Custodian of records for Centered for Life Counseling Records, 2487 Demere Road, Saint Simons Island, GA 31522
55. Custodian of records for Emerald Isle Counseling, 203 Marina Drive, St. Simons Island, GA 31522
56. Custodian of records for Louisiana State University Health Science Center, 433 Bolivar St., New Orleans, LA 70112
57. Custodian of records for Lawrenceville Police Department, 300 Jackson St., Lawrenceville, GA 30046
58. Custodian of records for Dunwoody Police Department, 4800 Ashford Dunwoody Road, Suite #239, Dunwoody, GA 30338
59. Custodian of records for Gwinnett County Police Department, 770 Hi Hope Road Lawrenceville, GA 30044
60. Custodian of records for Bossier Parish Sherriff's Office, 7076 LA-3, Benton, LA 71006
61. Custodian of records for Atlanta Police Department, 226 Peachtree St SW, Atlanta, GA 30303
62. Custodian of records for Alpharetta Police Department, 2565 Old Milton Pkwy, Alpharetta, GA 30009
63. Custodian of records for Sandy Springs Police Department, 7840 Roswell Rd #301, Sandy Springs, GA 30350
64. Custodian of records for Chiropractic Health Clinic, 2650 Holcomb Bridge Rd #750, Alpharetta, GA 30022
65. Custodian of records for Metro Atlanta Recovery, 2815 Clearview Place, Atlanta, GA 30340
66. Custodian of records for Highland River Medical, 3830 South Cobb Drive Suite 300, Smyrna, GA 30080



67. Custodian of records for Northside Hospital Duluth, 3620 Howell Ferry Rd NW, Duluth, GA 30096
68. Custodian of records for ML Health, 3525 Piedmont Road NE #600, Atlanta, GA 30305
69. Custodian of records for Lakeview Behavioral Health, 1 Technology Pkwy S, Norcross, GA 30092
70. Custodian of records for Rightside Up, 2815 Clearview PL #100, Atlanta, GA 30340
71. Custodian of records for Ridgeview Institute, 3995 South Cobb Drive, Smyrna, GA 30080
72. Custodian of records for Rescuing Hope, 1750 Powder Springs Rd., Suite 190, Box 112, Marietta, GA 30064
73. Custodian of records for Planned Parenthood, 330 N. Howard Street, Baltimore, MD 21201
74. Custodian of records for Crossroads Treatment Center, 8 Doctors Park Rd., Mount Vernon, IL 62864
75. Custodian of records for C.O.R.E. Medical Clinic, 2100 Capitol Ave, Sacramento, CA 95816
76. Custodian of records for Bend Treatment Center, 155 NE Revere Ave #150, Bend, OR 97701
77. Custodian of records for Merced Union High School, 3430 A Street, Atwater, CA 95301 or 3500 G Street, Merced, CA 95340 (depending on how old records are)
78. Custodian of records for Duluth Police Department, 3276 Buford Hwy, Duluth, GA 30096
79. Custodian of records for Lexington County Sheriff's Office, 521 Gibson Rd., Lexington, SC 29072
80. Custodian of records for Atlanta Medical Center, 303 Parkway Dr NE, Atlanta, GA 30312
81. Custodian of records for Georgia Treatment Center, 1742 Mt Vernon Rd #100, Dunwoody, GA 30338
82. Custodian of records for St. Jude's Recovery Center/ Ascensa Health, 139 Renaissance Pkwy NE, Atlanta, GA 30308
83. Custodian of records for Phoenix Direct Employment, 2625 N Berkeley Lake Rd NW #100, Duluth, GA 30096
84. Custodian of records for Centerville Medical Center, 3555 Centerville Hwy Suite 100, Snellville, GA 30039

- 85. Custodian of records for Emory Crawford Long Hospital, 550 Peachtree St NE, Atlanta, GA 30308
- 86. Custodian of records for Bioreference Laboratories, 481 Edward H Ross Dr, Elmwood Park, New Jersey 07407
- 87. Custodian of records for Helen Ross McNabb Medical Center, 5645 Merchants Center Blvd., Knoxville, TN 37912
- 88. Custodian of records for Brookhaven Police Department, 2665 Buford Hwy NE, Atlanta, GA 30324
- 89. Custodian of records for Dekalb County Jail, 4425 Memorial Dr, Decatur, GA 30032

### **Defendant's Expert Witness List**

At trial, Defendants will call the following expert witnesses:

- 1. Matthew Norman, M.D., 4401 Northside Parkway, NW Suit 25, Atlanta, GA 30327
- 2. Greg Bristol, 15920 Fairway Drive, Montclair, Virginia 22025
- 3. Dr. Kimberly Mehlman-Orozco, 15920 Fairway Drive, Montclair, Virginia 22025

**ATTACHMENT “G-1”**  
**PLAINTIFFS’ PROPOSED EXHIBIT LIST WITH DEFENDANTS’ OBJECTIONS**

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX001	RRI 002683- RRI 002704	RRI 002683-RRI 002704.pdf	Operating Agreement of RRF Holding Company, LLC	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (not a party to the case); also marked AEO
PX002	RRI 002631- RRI 002682	RRI 002631-RRI 002682.pdf	Second Amended and Restated Operating Agreement of Red Roof Franchising, LLC	
PX003	RRI_WK_00008194- RRI_WK_00008212	Austin 244.pdf	2013/10/24 Framingham RRI email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Red Roof Inn Framingham)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX004	N/A	WK_14.pdf	2014/12/14 Marietta Police Report	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Red Roof Inn on Windy Hill Rd), and authentication
PX005	Pltf. W.K.-00367- Pltf. W.K.-000369	WK_15.pdf	2014/12/07 Cobb County Incident/Investigative Report	Authentication
PX006	Westmont 002726; RRI 000941- RRI 000984	Park Exhibit No. 329.pdf	RRI - FMC Structure Chart and 2011/08/25 Franchise Agreement between Red Roof Franchising, LLC and FMW RRI NC LLC	
PX007	N/A	Park Exhibit No. 343.pdf	2022/04/26 Red Roof Inns, Inc.'s Objections and Responses to Plaintiffs' Second Interrogatories to RRI West Management, LLC	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX008	N/A	Park Exhibit No. 338.pdf	List of fiscal years, room revenue, royalty %, and franchise royalty	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 until a finding of punitive damages
PX009	N/A	Park Exhibit No. 326.pdf	RRF, RRI, and RRI West Organizational Map	
PX010	N/A	DP_12.pdf	2015/02/02 Cobb County Incident/Investigative Report	Authentication
PX011	N/A	DP 25.pdf	RRI Lobby Photo	
PX012	N/A	CONFMichaelBeene 2.pdf	RRI Atlanta Buckhead photos	
PX013	N/A	CONFMichaelBeene _3.pdf	2011/09/06 Dekalb County Police Department Incident Report	
PX014	N/A	CONFMichaelBeene 4.pdf	RRI Smyrna Photos	
PX015	N/A	CONFMichaelBeene _16.pdf	2012/10/05 Beene Tweet	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX016	N/A	CONFMichaelBeene 5.pdf	Beene Twitter Page	
PX017	N/A	CONFMichaelBeene 6.pdf	2012/09/30 Tweet with added labels	
PX018	N/A	CONFMichaelBeene 22.pdf	2010/06/18 Online Order for Beene	
PX019	N/A	CONFMichaelBeene 19.pdf	2012/04/16 Beene Tweet	
PX020	N/A	102221-Castille-D8.pdf	Photos	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (includes photos of plaintiffs other than Jane Does 1-4)
PX021	N/A	102221-Castille-P12.pdf	Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403
PX022	N/A	102221-Castille-P13.pdf	Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX023	N/A	2022-01-19 - Hamilton-1.pdf;011922-Hamilton-1.pdf	Aerial Photo of RRI Atlanta RRI	
PX024	N/A	2022-01-19 - Hamilton-3.pdf;011922-Hamilton-3.pdf	Photos of Atlanta RRI	
PX025	N/A	011922-Hamilton-2.pdf;2022-01-19 - Hamilton-2.pdf	Photo of Atlanta RRI	
PX026	N/A	CONFTradelleLacy_2.pdf	Photos of Atlanta RRI	
PX027	N/A	McElroy MCD 3.pdf	Statement of Thomas McElroy	Inadmissible hearsay
PX028	N/A	McElroy MCD 4.pdf	2014/05/01 US Dept of Labor Re: RRI West Management/ McElroy	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX029	N/A	McElroy MCD 1.pdf	2012/06 RRI Corporate Office InnSider	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX030	N/A	McElroy 317.pdf	Tom McElroy Tweets re Human Trafficking Awareness Resources	Inadmissible hearsay
PX031	RRI_WK_00016105-RRI_WK_00016106	McElroy 318.pdf	2016/03/21 Email from Kevin Scholl re McElroy	
PX032	N/A	102021-Sarkisian-D1.pdf	2021/08/21 Sarkisian Email to McDonough re Conversation with George Limbert	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)
PX033	N/A	020222-Thomas-P2.pdf	RRI Atlanta Buckhead photo	
PX034	N/A	020222-Thomas-P3.pdf	RRI Atlanta Buckhead photo	
PX035	N/A	020222-Thomas-P1.pdf	RRI Atlanta Buckhead photo	
PX036	N/A	Galbraith 324.pdf	Plaintiff's 2nd Amended 30b6 Notice of Deposition of RRI	Relevance under Rule 401 and lack of foundation
PX037	RRI_WK_00011307-RRI_WK_11315	Limbert 174.pdf	Affidavit of Shawna Drummond	Inadmissible hearsay
PX038	N/A	Limbert 161.pdf;p0.pdf	Denim Day Campaign	



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX039	N/A	Lam 012.pdf	Vickie Lam - Region 4 Chart	What time period is this from? Check depo
PX040	N/A	Lam 009.pdf	Chart of Complaints of Atlanta RRIs	Privilege
PX041	N/A	Limbert 160.pdf;p0.pdf	RRI Social Media Posts on Human Trafficking	What year is this from? Check depo
PX042	N/A	Limbert 165.pdf	The Vindicator: Rasing the Roof article about George Limbert	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403
PX043	RRI_WK_00005596- RRI_WK_00005598; RRI_WK_00004268- RRI_WK_00004269	Lam 011.pdf	2016/01/25 Email from Vickie Lam Smyrna RRI Update Attaching Correspondence with Cobb County Police	
PX044	WRRH 000234	Limbert 187.pdf	RRI - Dune Structure Chart	
PX045	WRRH 000236	Limbert 185.pdf	RRI Organizational Chart	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX046	N/A	Limbert 170.pdf	GA Code Keeping a place of prostitution	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (jurors need instructed on the law through jury instructions, not a proper exhibit)
PX047	N/A	Limbert 167.pdf	2021/11/12 Crisis Management and Beyond: RR's New CEO on Pivoting to Survive and Prosper article	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)
PX048	N/A	Limbert 184.pdf	Texas Franchise Public Information Report re Westmont Hospitality Group, Inc. 2012-2021	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX049	N/A	Limbert 166.pdf	2021/10/15 Hotel Business Article on George Limbert	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)
PX050	Miscellaneous	Limbert 183.pdf	2012/01/18 Smyrna Composite	
PX051	RRIF000382-RRIF000405	McDonald 325.pdf	2016 Crisis Communications	AEO
PX052	N/A	McDonald 324.pdf	2022/08/22 Plaintiffs' 2nd Amended 30b6 Notice of Deposition of RRI	Relevance under Rule 401 and lack of foundation
PX053	N/A	MacDonald 291.pdf	2022/04/06 Red Roof Franchising, LLC's Objections and Responses to Plaintiffs' Second Interrogatories	
PX054	RRI_WK_00005325; RRI_WK_00050536	MacDonald 301.pdf	2016/07/01 Email from Billio to MacDonald re Crisis Monitoring Dashboard 2016	Privilege
PX055	N/A	Moyer 101.pdf	Red Roof Smyrna Photo	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX056	JDX0000216-JDX0000219	Moyer 113.pdf	2013/10/31 Brookhaven Police Report	
PX057	JDX0005295-JDX0005298	Moyer 110.pdf	2013/07/10 Dekalb County Police Report	
PX058	N/A	Moyer 102.pdf	Red Roof Buckhead Photo	
PX059	JDX0000192-JDX0000198	Moyer 112.pdf	2013/10/24 Brookhaven Police Report	
PX060	RRI_WK_00004873; RRI_WK_00004871- RRI_WK_0004872	Moyer 117.pdf	Email from Daniel to Jay Moyer re: Prostitutes, 8/17/2012	
PX061	JDX0000149-JDX0000152	Moyer 111.pdf	2013/09/20 Brookhaven Police Report	
PX062	RRI_WK_00012074- RRI_WK_00012076; RRI_WK_00001150- RRI_WK_00001181	Moyer 109.pdf	2014/08/14 Email from Jay Moyer to Michelle Wehrle re: "Preventing and reacting to child sex trafficking" webinar	
PX063	N/A	Stocker 207.pdf	2008/03/21 "5 Charged in federal probe of child prostitution rings" Detroit News	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated property)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX064	N/A	Stocker 204.pdf	2022/04/08 Plaintiffs' 30(b)(6) Notice of Deposition of FMW RRI NC, LLC; Plaintiffs' 30(b)(6) Notice of Deposition of Red Roof Franchising, LLC; Plaintiffs' 30(b)(6) Notice of Deposition of RRI III, LLC; Plaintiffs' 30(b)(6) Notice of Deposition of RRI West Management, LLC; Plaintiffs' 30(b)(6) Notice of Deposition of Red Roof Inns, Inc.	Relevance under Rule 401 and lack of foundation
PX065	N/A	Stocker 203.pdf	Greg Stocker Linked In Resume	
PX066	N/A	Vittatoe 191.pdf	2004/01/28 "Police Target Motel 6 Chief Says Place is 'Crime-Infested'" Atlanta Journal Constitution	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX067	N/A	Vittatoe 188.pdf	1996/07/25 "Child prostitution plea lengthen's pimps term" Dallas Morning News	
PX068	N/A	Vittatoe 201.pdf	2019/08/21 Vittatoe Consulting Tweet: "Heads in beds"	Inadmissible hearsay
PX069	N/A	Vittatoe 199.pdf	2010/06/17 "2 face sex trafficking charges" Milwaukee Journal Sentinel	
PX070	N/A	Vittatoe 202.pdf	2020/02/24 Vittatoe Consulting Tweet: What will your settlement number be if you fail to provide training	Inadmissible hearsay
PX071	N/A	Vittatoe 200.pdf	2020/04/30 Vittatoe Consulting Tweet: Motel owners who knowingly profit and patronize the sex trafficking business	Inadmissible hearsay

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX072	RRI_WK_00011324- RRI_WK_00011326	Vittatoe 197.pdf	2008/03/09 Email from RRI 7085 to Jay Moyer re: Prostitution Incident Report	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated property in South Carolina)
PX073	N/A	Vittatoe 190.pdf	2003/12/26 "Hotel Chain to help end criminal activity" Chicago Tribune	
PX074	N/A	Vittatoe 192.pdf	Vittatoe Lined In Resume	
PX075	N/A	Vittatoe 189.pdf	2005/07/16 "2 Charged with running brothel" Asbury Park Press	
PX076	N/A	Vittatoe 198.pdf	2008/03/21 "5 Charged in federal probe of child prostitution rings" Detroit News	
PX077	JDX0000027- JDX0000033	Patel 272.pdf	2016/01/13 ATL Trafficking Article: "Red Roof Inn Runs Rampant	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX078	N/A	Patel 259.pdf	2011/06/14 Trip Advisor Review, Masters Inn Tucker	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX079	N/A	Patel 290.pdf	Handwritten Note: 13 Negative Reviews	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX080	VARAHI002697	Patel 266.pdf	Human Trafficking Poster	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX081	JDX0000021-JDX0000026	Patel 273.pdf	2016/01/21 ATL Trafficking Article: "Red Roof Admits Sex Trafficking Occues in its Rooms!"	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX082	N/A	RP-001.pdf	2016/01 Various ATL Trafficking Articles	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX083	Varahi 1035- Varahi 1064	Patel 286.pdf	Incident Log Book for GSR/Security/Police Report	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX084	N/A	Scan - 2022-09-02 12.20.21.pdf	Norman Fee Schedule-RRI	
PX085	JD10002050	JD1 10.pdf	JD1 Photo	
PX086	N/A	Norman 006A.pdf	Norman Handwritten Notes	
PX087	N/A	Norman 007.pdf	National Center for PTSD Checklist for DSM-5 With Life Events Checklist for DSM-5 and Criterion A	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX088	NORMAN0152- NORMAN000153; NORMAN000145; NORMAN000148; NORMAN000142	Norman 011.pdf	Matthew Norman, MD LLC Service Invoice	
PX089	N/A	Norman 008.pdf	National Center for PTSD Checklist for DSM-5	
PX090	N/A	Norman 005.pdf	2005/05 AAPL Ethics Guideline for the Practice of Forensic Psychiatry	
PX091	N/A	Norman 004.pdf	AAPL Practice Guideline for the Forensic Assessment. Journal of the American Academy of Psychiatry and the Law 42[2]: S3- S53 (2015 Supplement).	
PX092	N/A	Mehlman-Orozco 002.pdf	2020 Return of Organization Exempt from Income Tax, FLI d/b/a Freedom Light	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX093	N/A	Mehlman-Orozco 001.pdf	USA Sex Guide Posts mentioning Red Roof	
PX094	N/A	JD1 2ndAm Comp Para33.pdf	JD1 2nd Amended Complaint, Paragraph 33- No Refunds Signs Smyrna RRI	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct); also use of Complaint is an improper exhibit (it is not evidence) ok to just use pictures as Exhibit
PX095	JDX0005079-JDX0005308	Dekalb Police- RRI-DH.pdf	Dekalb County Police Department- Police Reports Compilation- RRI-Druid Hills (Buckhead)	Hearsay to narrative reports/statements within; relevance as to non-similar crimes; authentication
PX096	JDX0000111-JDX0002247; Pltf-RRI0002222; Pltf-RRI0006398-Pltf-RRI0006458	Brookhaven Police Reports- RRI-DH.pdf	Brookhaven Police Department- Police Reports Compilation- RRI-Druid Hills (Buckhead)	Hearsay to narrative reports/statements within; relevance as to non-similar crimes; authentication

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX097	JDX0005317- JDX0005339	Marietta Police- RRI- Smyrna.pdf	Marietta Police Department Police- Police Reports Compilation- RRI- Smyrna	Hearsay to narrative reports/statements within; relevance as to non-similar crimes; authentication
PX098	JDX0005397- JDX0005451	Smyrna-RRI Misc Police Reports.pdf	Miscellaneous Police Reports Compilation- RRI-Smyrna	Hearsay to narrative reports/statements within; relevance as to non-similar crimes; authentication
PX099	JDX0002248- JDX0005078; Pltf.- RRI0006459-Pltf.- RRI0006891	Cobb County Police- Smyrna-RRI.pdf	Cobb County Police Department- Police Reports Compilation- RRI-Smyrna	Hearsay to narrative reports/statements within; relevance as to non-similar crimes; authentication
PX100	JDX0005564- JDX0005565	Online Reviews-RRI- DH-Booking.com.pdf	Online Reviews Compilation- Booking.com- RRI- Druid Hills (Buckhead)	Authentication

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX101	JDX0005547; JDX0005549- JDX0005550; JDX0005552; JDX0005632- JDX0005635; JDX0005637- JDX0005640	Online Reviews-RRI-DH-Expedia.pdf	Online Reviews Compilation- Expedia-RRI-Druid Hills (Buckhead)	Authentication
PX102	JDX0005566- JDX0005575	Online Reviews-RRI-DH-Google.pdf	Online Reviews Compilation- Google-RRI-Druid Hills (Buckhead)	Authentication
PX103	JDX0005517- JDX0005521; JDX0005545; JDX0005548; JDX0005548; JDX0005551; JDX0005553; JDX0005556- JDX0005563; JDX0005576; JDX0005636	Online Reviews-RRI-DH-TripAdvisor.pdf	Online Reviews Compilation- Trip Advisor- RRI-Druid Hills (Buckhead)	Authentication

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX104	JDX0005314- JDX0005315; JDX0005617	Online Reviews-RRI-Smyrna-Facebook.pdf	Online Reviews Compilation- Facebook-RRI-Smyrna	Authentication
PX105	JDX0005577- JDX0005583; JDX0005604- JDX0005606	Online Reviews-RRI-Smyrna-Google.pdf	Online Reviews Compilation- Google-RRI-Smyrna	Authentication
PX106	JDX0005522- JDX0005544; JDX0005546; JDX0005554- JDX0005555; JDX0005590- JDX0005603; JDX0005607- JDX0005616; JDX0005618- JDX0005631	Online Reviews-RRI-Smyrna-TripAdvisor.pdf	Online Reviews Compilation- TripAdvisor- RRI-Smyrna	Authentication
PX107	AHLA_WK_RR_0001945- AHLA_WK_RR_0001950	Limbert 169.pdf	2014/05/05 Emails about purchasing the role of hospitality in preventing and reacting to child sex trafficking	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX108	JANEDOE02-MR000001;JD20001325	JANEDOE02-MR000001.pdf	Photo	
PX109	JD10000712-JD10000719	JD1_17.pdf;5259600_Exhibit_17_Kristin Krawczyk.pdf	2015/08/29 Emory Physician Report JD 1	
PX110	JD10001280	JD1_13.pdf	2013/10/22 Cartersville Medical Center JD 1 Admission Record	
PX111	JD10001293-JD10001294; JD10001310	JD1_16.pdf;5259600_Exhibit_16_Kristin Krawczyk.pdf	2013/10/22 Cartersville Medical Center JD 1 Patient Information and Ultrasound Report	
PX112	JD10000029-JD10000032	JANEDOE01-KK000062.pdf	2016/10/13 Intake Mental Health Assessment Jane Doe 1	
PX113	JD10000075-JD10000077	JANEDOE01-KK000116.pdf	2014/12/09 Jane Doe 1 Wellpath Record- MSE & Clinical Note	
PX114	JD10000162-JD10000165	JANEDOE01-KK000112.pdf	2014/10/31 Jane Doe 1 Wellpath Intake Mental Health Assessment	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX115	JD10000184-JD10000187	JANEDOE01-KK000124.pdf	2015/01/22 Jane Doe 1 Wellpath HIV Pre/Post Test Counseling Progress Notes	
PX116	JD10000465	JANEDOE01-KK000279.pdf	2020/02/04 Jane Doe 1 Crossroads Treatment Center Case Notes	
PX117	JD10000471-JD10000473	JANEDOE01-KK000283.pdf	2020/03/27 Jane Doe 1 Crossroads Treatment Center-Treatment Plans	
PX118	JD10000476-JD10000516	JANEDOE01-KK000285.pdf	Jane Doe 1 Georgia Treatment Center Records	
PX119	JD10000712-JD10000718	JANEDOE01-KK000294.pdf	2015/08/29 Jane Doe 1 Emory ED Physician Report	
PX120	JD10001161-JD10001162	JANEDOE01-KK000570.pdf	2019/02/04 Jane Doe 1 Rescuing Hope: Survivor Intake Form	
PX121	JD10001193	JANEDOE01-KK000594.pdf	2019/01/03 Jane Doe 1 Rescuing Hope Personal Statement	Inadmissible hearsay



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX122	JD10001280	JANEDOE01-KK000422.pdf	2013/10/22 Jane Doe 1 Cartersville Medical Record	
PX123	JD10001320-JD10001321	JANEDOE01-KK000432.pdf	2013/10/22 Jane Doe 1 Cartersville Medical Center Patient Discharge Instructions	
PX124	JD10001339-JD10001343	JANEDOE01-KK000408.pdf	2013/11/05 Jane Doe 1 Atlanta Medical Center Record	
PX125	JD10001388-JD10001393	JANEDOE01-KK000366.pdf	2014/01/06 Jane Doe 1 Wellstar Kennestone Emergency Department Record	
PX126	JD10001394-JD10001401	JANEDOE01-KK000367.pdf	2014/01/06 Jane Doe 1 Wellstar Kennestone Inpatient Record	
PX127	JD10001474-JD10001480	JANEDOE01-KK000379.pdf	2018/02/02 Jane Doe 1 Wellstar Kennestone Inpatient Record	
PX128	JD10001686-JD10001708	JANEDOE01-KK000401.pdf	2018/02/05 Jane Doe 1 Wellstar Kennestone After-Visit Summary	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX129	JD10001790- JD10001803	JANEDOE01- KK000340.pdf	2017/06/22 Jane Doe 1 Wellstar Kennestone ObGyn Medical Records	
PX130	JD20001922- JD20001923	JANEDOE02- MR000373.pdf	2014/06/17 Jane Doe 2 Peachford Behavioral Health Expressive Therapy Assessment	
PX131	JD20001938	JANEDOE02- MR000379.pdf	2014/06/16 Jane Doe 2 Peachford Behavioral Health Patient Discharge Order	
PX132	JD20002264- JD20002270	JANEDOE02- MR000467.pdf	2020/03/24 Jane Doe 2 Peachford Behavioral Health Psychological Assessment	
PX133	JD20002271- JD20002277	JANEDOE02- MR000468.pdf	2020/03/24 Jane Doe 2 Peachford Behavioral Health Psychological Assessment	
PX134	JD20003895	IMG_20130908_010 903.jpg	Jane Doe 2 Photo	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX135	JD30000068-JD30000069	JANEDOE03-SV000101.pdf	2011/06/06 Jane Doe 3 LSU Health Sciences Center Emergency Dept Record	
PX136	JD30000071-JD30000074	JANEDOE03-SV000100.1.pdf	Jane Doe 3 LSU Hospital Records Certification	
PX137	JD30000335-JD30000341	JANEDOE03-SV000351.pdf	2011/10/26 JD3 Gwinnett County Police Department Report	
PX138	JD40000047	JANEDOE04-CE000045.pdf	2012/01/31 Jane Doe 4 Peachford Behavioral Health Crisis Recovery/Safety Plan-Triggers and Stressors	
PX139	JD40001243	0333.pdf	2012/04/12 Letter from JD4's Grandmother	
PX140	JDX0000075-JDX0000085;Pltf-RRI0000075-Pltf-RRI0000085	Red Roofie Blog.pdf	2014/07/01 Red Roofie Blog RRI-Smyrna	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), authentication, hearsay

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX141	JDX0000149-JDX0000152	CONFMeghanHarrsc h_1.pdf	2013/09/20 Brookhaven Incident/Investigation Report	
PX142	JDX0008922;Pltf-RRI-0010181	March 2.docx	2015/03/02 Word document from Dorraine Lallani re Confidential Ownership Information	
PX143	NORMAN0030-NORMAN0037	Norman 010.pdf	Matthew Norman Consulting Invoices	
PX144	NORMAN0030-NORMAN0037	Norman Invoices.pdf	Norman Invoices Produced in Advance of Deposition	
PX145	NORMAN0067-NORMAN0128	Norman- JD1.pdf	2022/07/08 Jane Doe 1 Norman IME Psychiatry Narrative Report Template	
PX146	NORMAN0092-NORMAN0129	Norman- JD2.pdf	2022/06/29 Jane Doe 2- Norman IME Notes	
PX147	NORMAN0141-NORMAN0181	Norman 0141-181.pdf	Emails regarding invoices produced by Dr. Norman Prior to Deposition	
PX148	Pltf.-RRI0006361-Pltf.-RRI0006363	102021-Sarkisian-P6.pdf	The Code article	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX149	Pltf.-RRI0006364- Pltf.-RRI0006365	102021-Sarkisian-P5.pdf	ECPAT article	
PX150	PLAINTIFF- 00009513 (RRI)	Lam 033.pdf	RRI Six Flags Hotel Reviews- Orbitz	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (unrelated property in 2019 - RRI Six Flags), and authentication
PX151	PLAINTIFF- 00009514 (RRI)	Lam 032.pdf	RRI Six Flags Hotel Reviews- Orbitz	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (unrelated property in 2019 - RRI Six Flags), and authentication
PX152	PLAINTIFF- 00009515 (RRI)	Lam 031.pdf	RRI Six Flags Hotel Reviews- Orbitz	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (unrelated property in 2019 - RRI Six Flags), and authentication

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX153	Pltf. C.A.001320	CA_11.pdf	2010/01/29 CA Craigslist Account Welcome email	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff), and authentication
PX154	Pltf. C.A.004427	CA_21.pdf	Choose Up or Lose Up Logo	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff), and authentication
PX155	Pltf. C.A.009135	CONFMichaelBeene_7.pdf	Photo of men wearing Choose up or Lose up t-shirts	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff), and authentication
PX156	Pltf. K.P.001505	CONFMichaelBeene_14.pdf	Photo of men with cash	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff), and authentication

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX157	Pltf. R.K.-000014- Pltf. R.K.-000015	RK_13.pdf	Georgia Department of Corrections Offender Report- R.K.	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff), and authentication
PX158	Pltf. R.K.-000016- Pltf. R.K.-000025	RK_9.pdf	2011/10/26 Gwinnett Police Incident Report	Hearsay to narrative reports/statements within, authentication
PX159	Pltf-RRI0000075- Pltf-RRI0000085	102021-Sarkisian-P9.pdf	Red Roofie Blog article	
PX160	Pltf-RRI0002284- Pltf-RRI0002285	Patel 360.pdf	2017/09/05 RRI Public Safety Nuisance Abatement Meeting	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post period of alleged trafficking and Varahi conduct)
PX161	Pltf-RRI0005150- Pltf-RRI0005152	011922-Hamilton-5.pdf;2022-01-19 - Hamilton-5.pdf	List of reports, case numbers, descriptions, and offense descriptions	Relevance under Rule 401 and unfair prejudice and confusion of the issues and cumulative evidence under Rule 403; Authentication

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX162	Pltf-RRI0005336-Pltf-RRI0005339	011922-Hamilton-6.pdf;2022-01-19 - Hamilton-6.pdf	2013/07/10 Dekalb Police Incident Report	
PX163	Pltf-RRI0005509	Patel 364.pdf	2014/06/19 RRI Smyrna TripAdvisor Review	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX164	Pltf-RRI0005511	Patel 365.pdf	2014/08/25 RRI Smyrna TripAdvisor Review	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX165	Pltf-RRI0005512	Patel 366.pdf	2014/08/30 RRI Smyrna TripAdvisor Review	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX166	Pltf-RRI0005514	Patel 372.pdf	2015/09/08 RRI Smyrna TripAdvisor Review	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX167	Pltf-RRI0005515	Patel 371.pdf	2015/08/25 RRI Smyrna TripAdvisor Review	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX168	Pltf-RRI0005516	Patel 370.pdf	2015/08/13 RRI Smyrna TripAdvisor Review	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX169	Pltf-RRI0005517	Patel 367.pdf	2014/09/07 RRI Smyrna TripAdvisor Review	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX170	Pltf-RRI0005519	Patel 369.pdf	2015/08/09 RRI Smyrna TripAdvisor Review	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX171	Pltf-RRI0005520	Patel 368.pdf	2015/07/25 RRI Smyrna TripAdvisor Review	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX172	Pltf-RRI0005549; Pltf-RRI0005509; Pltf-RRI0005545; Pltf.-RRI0006339- Pltf.-RRI0006340; Pltf-RRI0005510- Pltf-RRI0005512; Pltf-RRI0005517; Pltf-RRI0005455- Pltf-RRI0005456; Pltf-RRI0005520; Pltf-RRI0005519; Pltf-RRI0005516; Pltf-RRI0005515; Pltf-RRI0005514; Pltf-RRI0005542; Pltf-RRI0005444; Pltf-RRI0005443; Pltf-RRI0005550; Pltf-RRI0005538	Patel 270.pdf	Cmpilation RRI Smyrna TripAdvisor Reviews	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX173	Pltf-RRI0005549	Patel 363.pdf	RRI Smyrna TripAdvisor Review	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX174	Pltf-RRI0006120	00516.MTS	Operation Liberate Video 516	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX175	Pltf-RRI0006121	00517.MTS	Operation Liberate Video 517	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX176	Pltf-RRI0006124	00520.MTS	Operation Liberate Video 520	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX177	Pltf-RRI0006125	00521.MTS	Operation Liberate Video 521	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX178	Pltf-RRI0006126	00522.MTS	Operation Liberate Video 522	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX179	Pltf-RRI0006127	00528.MTS	Operation Liberate Video 528	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX180	Pltf-RRI0006130	00531.MTS	Operation Liberate Video 531	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX181	Pltf-RRI0006137	00538.MTS	Operation Liberate Video 538	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX182	Pltf-RRI0006139	00540.MTS	Operation Liberate Video 540	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX183	Pltf-RRI0006144	00545.MTS	Operation Liberate Video 545	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX184	Pltf-RRI0006148	00549.MTS	Operation Liberate Video 549	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX185	Pltf-RRI0006152	00553.MTS	Operation Liberate Video 553	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX186	Pltf-RRI0006162	00563.MTS	Operation Liberate Video 563	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX187	Pltf-RRI0006180	00586.MTS	Operation Liberate Video 586	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX188	Pltf-RRI0006186	00592.MTS	Operation Liberate Video 592	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX189	Pltf-RRI0006188	00594.MTS	Operation Liberate Video 594	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX190	Pltf-RRI0006189	00595.MTS	Operation Liberate Video 595	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX191	Pltf-RRI0006193	00599.MTS	Operation Liberate Video 599	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity
PX192	Pltf-RRI0006196	00602.MTS	Operation Liberate Video 602	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and authenticity



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX193	Pltf-RRI0006203- Pltf-RRI0006216	102021-Sarkisian-P2.pdf	Sarkisian, M. (2015). Adopting the Code: Human Trafficking and the Hospitality Industry. Cornell Hospitality Report 15[15]: 3-10	Authenticity; Foundation
PX194	Pltf-RRI0006220- Pltf-RRI0006221	102021-Sarkisian-P4.pdf	2021/10/15 Email from Sarkisian: Trafficking-one example at Red Roof Inn	
PX195	Pltf-RRI0006386- Pltf-RRI0006388	102021-Sarkisian-P7.pdf	2021/10/15 Email from Sarkisian to P. McDonough re Training and ECPAT	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)
PX196	Pltf-RRI0006390- Pltf-RRI0006391	102021-Sarkisian-P8.pdf	2021/10/15 Email from Sarkisian to P. McDonough forwarding the email sent to A. Alexander and G. Limbert	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX197	Pltf.-RRI0006394	102221-Castille-P11.pdf	Photo of M.M.	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX198	Pltf-RR1-0010181	Austin 221.pdf	Letter from Lallani re Confidential Ownership Information	
PX199	Pltf-SUB-JD1000026	Combined Files_Part24.pdf	2020/03/03 Jane Doe 1 Crossroads Treatment Center Case Notes	
PX200	Pltf-SUB-JD1000038	Combined Files_Part36.pdf	2020/10/13 Jane Doe 1 Crossroads Treatment Center Case Notes	
PX201	Pltf. C.A.004372	File134.jpeg	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403(unrelated plaintiff)
PX202	Pltf. C.A.004530	File371.jpeg	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX203	Pltf. C.A.004531	File372.jpeg	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX204	Pltf. C.A.004532	File373.jpeg	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX205	Pltf. C.A.004534	File375.jpeg	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX206	Pltf. C.A.004535	File376.jpeg	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX207	Pltf. C.A.004537	File378.jpeg	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX208	Pltf. C.A.004538	File379.jpeg	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX209	Pltf. C.A.005312	File549.jpeg	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX210	Pltf. C.A.005744	File636.jpeg;File609.jpeg	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX211	Pltf. C.A.005764	File627.jpeg	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX212	Pltf. C.A.005900	File68.png	Bagz photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX213	Pltf. C.A.005905	File684.jpeg	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX214	Pltf. C.A.005970	File743.jpeg	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX215	Pltf. C.A.005976	File749.jpeg	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX216	Pltf. C.A.008975	File127.txt;File3.txt;File2.jpeg;File126.jpeg	Photo of man wearing "Choose Up' shirt	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX217	Pltf. C.A.008987	File394.jpeg;File41.txt;File40.jpeg;File395.txt	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX218	Pltf. C.A.009136	File37.jpeg	Mugshot of Bagz - Earnest Lloyd Wright	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX219	Pltf. C.A.009195	File496.jpeg;File497.txt	RK Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX220	Pltf. C.A.009221	File540.jpeg;File541.txt	CA Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX221	Pltf. D.P.017847	20170323_174103.jpg	DP Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX222	Pltf. D.P.017850	20170320_071529.jpg	DP Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX223	Pltf. E.H.004411-Pltf. E.H.004414	=UTF-8QYour_Saturday_evening_trip_with_Uber=.eml	2018/08/25 EH Uber Receipt	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX224	Pltf. E.H.004432-Pltf. E.H.004435	=UTF-8QYour_Tuesday_afternoon_order_with_Uber_Eats=.eml	2018/08/21 EH Uber Eats Receipt	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX225	Pltf. E.H.004436-Pltf. E.H.004439	=UTF-8QYour_Wednesday_evening_order_with_Uber_Eats=.em	2018/08/22 EH Uber Eats Receipt	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX226	Pltf. E.H.004440-Pltf. E.H.004443	=UTF-8QYour_Wednesday_evening_trip_with_Uber=.eml	2018/08/22 EH Uber Receipt	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX227	Pltf. E.H.004444-Pltf. E.H.004447	=UTF-8QYour_Wednesday_morning_trip_with_Uber=.eml	2018/08/22 EH Uber Receipt	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX228	Pltf. E.H.005004-Pltf. E.H.005006	Thank you for your Pizza Hut order.eml	2017/09/21 EH Pizza Hut Receipt	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX229	Pltf. E.H.005007-Pltf. E.H.005009	Thank you for your Pizza Hut order.eml	2018/05/31 EH Pizza Hut Receipt	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX230	Pltf. E.H.005037-Pltf. E.H.005038	Welcome to RediCard.eml	2014/08/11 EH RediCard Rewards Email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX231	Pltf. E.H.005211	IMG_20150930_150059.jpg	2015/09/30 EH Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX232	Pltf. E.H.007577	20170826_101325.jpg	2017/08/26 EH Photo on RRI Balcony	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX233	Pltf. E.H.007579	20170827_100145.jpg	2017/08/27 EH Photo in RRI Room	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX234	Pltf. E.H.007581	20170828_104110.jpg	2017/08/28 EH Photo in RRI Room	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX235	Pltf. E.H.007583	20170902_175734.jpg	2017/09/02 EH Photo in RRI Room	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX236	Pltf. E.H.007593	20170913_084342.jpg	2017/09/13 EH Photo in RRI Room	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX237	Pltf. E.H.007595	20170917_150847.jpg	2017/09/17 EH Photo in RRI Room	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX238	Pltf. E.H.007597	20170918_094407.jpg	2017/09/18 EH Photo in RRI Room	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX239	Pltf. E.H.007619	20180530_175250.jpg	2018/05/30 EH Photo on RRI Balcony	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX240	Pltf. E.H.007621	20180531_100331.jpg	2018/05/31 EH Photo in RRI Bathroom	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX241	Pltf. E.H.007623	20180603_224025.jpg	2018/06/03 EH Photo in RRI Room	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX242	Pltf. E.H.007629	20180605_135027.jpg	2018/06/05 EH Photo on RRI Balcony	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX243	Pltf. E.H.007631	20180616_195647.jpg	2018/06/16 EH Photo in RRI Room	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX244	Pltf. E.H.007639	20180630_154911.jpg	2018/06/30 EH Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX245	Pltf. E.H.007641	20180630_171124.jpg	2018/06/30 EH Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX246	Pltf. E.H.007643	20180630_175338.jpg	2018/06/30 EH Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX247	Pltf. E.H.007651	20180713_123623.jpg	2018/07/13 EH Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX248	Pltf. E.H.007653	20180718_123317.jpg	2018/07/18 EH Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX249	Pltf. E.H.007659	20180727_181553.jpg	2018/07/27 EH Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX250	Pltf. E.H.007665	20180801_231457.jpg	2018/08/01 Photo of RRI-Smyrna Parking Lot	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX251	Pltf. E.H.007667	20180803_203747.jpg	2018/08/03 EH Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX252	Pltf. E.H.007669	20180806_200426.jpg	2018/08/06 EH Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX253	Pltf. E.H.007710	IMG_20161114_124200.jpg	2016/11/14 Photo of Branding	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX254	Pltf. E.H.007943	IMG_20150805_171910.jpg	2015/08/05 Photo of branding	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX255	Pltf. K.P.000458	431563_3409471272573_1143711064_3475423_2027734048_n.jpg.jpg	Traffickers Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX256	Pltf. K.P.000484	File55.jpeg;IMG_20130612_201712.jpg;IMG_20130612_201712#1.jpg	2013/06/12 Trafficker Photo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX257	Pltf. M.M.002073-Pltf. M.M.002151	MM0374-2021-09-23 PDF of M.M. Affidavit and Supporting Affidavits.pdf	2021/09/23 Affidavit of MM in Support of Petition and Supporting Documents	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff) and inadmissible hearsay
PX258	Pltf. M.M.002152-Pltf. M.M.002175	MM0375-2021-10-19 - PDF of MM Petition for Record Restriction 16FT6656_1 (35-3-37).PDF	2019/10/19 M.M. Petition to Restrict Criminal History Record Information	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX259	Pltf. M.M.002176- Pltf. M.M.002223	MM0376-2021-10-19 - PDF of MM Petition to Vacate 16FT6656_1 (17-10- 21).PDF	2021/10/19 MM Petition to Vacate Conviction	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX260	Pltf. M.M.002224- Pltf. M.M.002252	MM0377-2021-10-19 - PDF of MM Pleadings - Cobb State_1 (17-10- 21).PDF	2021/10/19 MM Petition to Vacate Conviction	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX261	Pltf. M.M.002253- Pltf. M.M.002354	MM0378-2021-10-19 - PDF of MM Pleadings - Cobb Superior (17-10- 21).pdf	2021/10/19 MM Petition to Vacate Conviction	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX262	Pltf. M.M.002355- Pltf. M.M.002361	MM0379-2021-11-02 - 12-9-0941 - Stip of Consent to Proposed Order for Vacatur of Convictions & Restric of Access.pdf	2021/11/02 MM Stipulatin of Consent to Proposed Order for Vacatur of Convictions and Restriction of Access	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX263	Pltf. M.M.002362- Pltf. M.M.002363	MM0380-2021-11-02 - 12-9-0941---Order Limiting Public Access to Crim History Record Info Under OCGA 35-3- 37.pdf	2021/11/02 MM Order Limiting Public Access to Criminal History Record Information	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX264	Pltf. M.M.002364- Pltf. M.M.002365	MM0381-2021-11-02 - 19-9-4753---Order Limiting Public Access to Crim History Record Info Under OCGA 35-3- 37.pdf	2021/11/02 MM Order Limiting Public Access to Criminal History Record Info	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX265	Pltf. M.M.002366- Pltf. M.M.002383	MM0382-2021-11-02 - Certified Copies MM Orders - Cobb Superior (17-10- 21).pdf	2021/11/02 MM Stipulation of Consent to Proposed Order for Vacatur of Convictions and Restriction of Access	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX266	Pltf. M.M.002384- Pltf. M.M.002390	MM0383-2021-11-02 -20-9-0581- Stip of Consent to Proposed Order for Vacatur of Convictions & Restrict of Access.pdf	2021-11-02 Stipulation of Consent to Proposed Order for Vacatur of Convictions and Restriction of Access	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX267	Pltf. M.M.002391- Pltf. M.M.002398	MM0384-MELANIE MANUS PRESENTATION 1.docx	MM Presentation	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX268	Pltf. W.K.-000380- Pltf. W.K.-000403	AAD125.pdf	2014/07/12 Investigative Follow Up for Aggravated Assault	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)
PX269	Prtf-RRI0005450	Patel 288.pdf	2013/07/07 TripAdvisor reviews Smyrna	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX270	RRI000135- RRI000136	Moyer 104.pdf	2019/12/12 Robert Earnest Allen II Status and Key Dates	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX271	RRI 000223-RRI000262	Wehrle 320.pdf	June 2012 RRI Inn Management InnSider	
PX272	RRI 000466-RRI000497	p0.pdf;Limbert 134.pdf	RRI Presentation Preventing & Reacting to Child Sex Trafficking	
PX273	RRI 000544-RRI00545	020222-Thomas-D1.pdf	Dec 2010 RRI Prostitution Notice	
PX274	RRI000777-RRI000800	Galbraith 001.pdf	Guest Redi Expectations 2013	
PX275	RRI 000117-RRI 000119	Moyer 105.pdf	2017/03/12 2016 Robert Allen Performance Evaluation	
PX276	RRI 000120-RRI 000122	Moyer 103.pdf	2014/02/16 2013 Robert Allen Performance Evaluation	
PX277	RRI 000178-RRI 000222	Stocker 206.pdf	Red Roof Inn GSR Innsider June 2012	
PX278	RRI 000223-RRI 000262	Lam 008.pdf	Red Roof Inn Inn Management Innsider June 2012	duplicate
PX279	RRI 000466-RRI 000497	RRI 000466-RRI 000497.pdf	RRI Presentation Preventing and Reacting to Child Sex Trafficking	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX280	RRI 000466-RRI 000508	102221-Castille-D4.pdf	RRI InnSider Employee Handbook January 2016	
PX281	RRI 000466-RRI 000491	020222-Thomas-D4.pdf	Jan 2016 InnSider Employee Handbook	duplicate
PX282	RRI 000509-RRI 000540	020222-Thomas-D3.pdf	RRI Presentation Preventing & Reacting to Child Sex Trafficking	
PX283	RRI 000509-RRI 000540	102221-Castille-D3.pdf	RRI Presentation Preventing & Reacting to Child Sex Trafficking	duplicate
PX284	RRI 000544-RRI 000545	102221-Castille-D1.pdf	Dec 2010 RRI Prostitution Notice	
PX285	RRI 000621-RRI 000624	RRI 000621-RRI 000624.pdf	2014 Guest Complaints	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX286	RRI 000625-RRI 000634	RRI 000625-RRI 000634.pdf	2015 Guest Complaints	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX287	RRI 000635-RRI 000641	RRI 000635-RRI 000641.pdf	2016 Guest Complaints	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX288	RRI 000677-RRI 000721	RRI 000677-RRI 000721.pdf	2010/11/11 Red Roof Inn Franchise Agreement Between RRF and DMARC 2007-CD5 Druid Hills, LP	
PX289	RRI 000722-RRI 000758	Austin 253.pdf	2011/03/02 Atlanta Druid Hills Exclusive Property Management Agreement Hospitality Property	
PX290	RRI 000772-RRI 000776	RRI 000772-RRI 000776.pdf	2013/05/07 Franchise Visitation Report RRI Smyrna	
PX291	RRI 000777-RRI 000800	Lam 001.pdf	2013/01/01 Guest Redi Expectations	
PX292	RRI 000923-RRI 000940	RRI 000923-RRI 000940.pdf	2012/03/28 RRI Weekly E-pak	
PX293	RRI 000923-RRI 000940	Moyer 108.pdf	2012/03/28 RRI Weekly E-pak	duplicate

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX294	RRI 000941-RRI 000984	RRI 000941-RRI 000984.pdf	2011/08/25 Franchise Agreement Between RRF and FMW RRI NC LLC	
PX295	RRI 000985-RRI 000990	RRI 000985-RRI 000990.pdf	2015/10/06 Franchise Visitation Report	
PX296	RRI 000991-RRI 001102	RRI 000991-RRI 001102(1).pdf	2011/08/25 Property Management Agreement between FMW RRI NC, LLC and RRI West Management, LLC	
PX297	RRI 000991-RRI 001102	RRI 000991-RRI 001102.pdf	2011/08/25 Property Management Agreement Between FMW RRI NC, LLC and RRI West Management, LLC	duplicate
PX298	RRI 000991-RRI 001102	Austin 225.pdf	2011/08/25 Property Management Agreement Between FMW RRI NC, LLC and RRI West Management, LLC	duplicate

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX299	RRI 001103-RRI 001411	RRI 001103-RRI 001411.pdf	2011/03/02 Exclusive Property Management Agreement RRI Druid Hills	
PX300	RRI 001423-RRI 001476	RRI 001423-RRI 001476.pdf	2012/12/14 Franchise Agreement Between RRF, LLC and Varahi Hotel, LLC	duplicate
PX301	RRI 001423-RRI 001476	Limbert 172.pdf	2012/12/14 Franchise Agreement Between RRF, LLC and Varahi Hotel, LLC	duplicate
PX302	RRI 002741-RRI 002753	Austin 223.pdf	2014/01/13 Minutes of Annual Meeting of the Sole Shareholder RRI	AEO
PX303	RRI 002754-RRI 002762	Park Exhibit No. 336.pdf	2010/03/01 Unanimous Written Consent of the Sole Member of RRF Holding Company in Lieu of Special Meeting	AEO
PX304	RRI 002763-RRI 002774	Park Exhibit No. 335.pdf	2013/01/22 Action of the Manager of RRF	AEO



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX305	RRI 002777-RRI 002936	Austin 228.pdf	2011/03/02 Lease Agreement between RRI I-IV LLC and RRI OPCO	AEO
PX306	RRI 004456	RRI 004456-RRI 004456.pdf	2018 JD2 Arrival and Departure	
PX307	RRI 004934-RRI 004936	RRI 004934-RRI 004936.pdf	2016/01/29 Email from Kessler to MacDonald re RRI Smyrna	
PX308	RRI 005234-RRI 005251	RRI 005234-RRI 005251.pdf	2012/03/28 Weekly e-Pak	duplicate
PX309	RRI 005278-RRI 005309	RRI 005278-RRI 005309.pdf	RRI Presentation Preventing and Reacting to Child Sex Trafficking	duplicate
PX310	RRI 005311-RRI 005312	Limbert 147A.pdf;p0.pdf	2016/01/22 Recent Issues at RRI Smyrna	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX311	RRI 005311-RRI 005312	AlanLTallisVolII_11.pdf	2016/01/22 Recent Issues at RRI Smyrna	duplicate
PX312	RRI 005311-RRI 005312	Patel 147A.pdf	2016/01/22 Recent Issues at RRI Smyrna	duplicate

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX313	RRI 005311-RRI 005312	Patel 147A.pdf	2016/01/22 Recent Issues at RRI Smyrna	duplicate
PX314	RRI 011682-RRI 012013	Park Exhibit No. 341.pdf	RRF Consolidated Financial Statements for the years ended December 31, 2010, 2009, and 2008	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 until a finding of punitive damages
PX315	RRI 011695-RRI 011994	Park Exhibit No. 342.pdf	RRI Consolidated Financial Statements for the years ended December 31, 2010 and 2009	duplicate
PX316	RRI 011734-RRI 011754	RRI 011734-RRI 011754.pdf	RRI Consolidated Financial Statements For the Years Ended December 31, 2012 and 2011	duplicate
PX317	RRI 012014	Park Exhibit No. 340.pdf	RRI West Statement of Income 2015-2018	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 until a finding of punitive damages

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX318	RRI Unredacted 002741-RRI Unredacted 002753	Park Exhibit No. 328.pdf	2014/01/13 Minutes of Annual Meeting of the Sole Shareholder RRI	duplicate
PX319	RRI unredacted 000722-RRI unredacted 000758	Park Exhibit No. 332.pdf	2011/03/02 Exclusive Property Management Agreement Hospitality Property Druid Hills	
PX320	RRI unredacted 000941-RRI unredacted 000984	Wehrle 319.pdf	2011/08/25 RRI Franchise Agreement between RRF and FMW RRI NC Smyrna	duplicate
PX321	RRI unredacted 000991-RRI unredacted 001102	RRI unredacted 000991-RRI unredacted 001102.pdf	2011/08/25 Unredacted Property Management Agreement between FMW RRI NC and RRI West	
PX322	RRI unredacted 000991-RRI unredacted 001102	Park Exhibit No. 331.pdf	2011/08/25 Unredacted Property Management Agreement between FMW RRI NC and RRI West Management	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX323	RRI unredacted 001423-RRI unredacted 001476	RRI unredacted 001423-RRI unredacted 001476.pdf	2012/12/14 Unredacted RRI Franchise Agreement between RRF and Varahi Hotel	duplicate
PX324	RRI unredacted 001423-RRI unredacted 001476	Park Exhibit No. 333.pdf	2012/12/14 Unredacted RRI Franchise Agreement between RRF and Varahi Hotels	duplicate
PX325	RRI unredacted 001423-RRI unredacted 001476	Galbraith 333.pdf	2012/12/14 Unredacted RRI Franchise Agreement between RRF and Varahi Hotels	duplicate
PX326	RRI unredacted 001423-RRI unredacted 001476	Patel 333.pdf	2012/12/14 Unredacted RRI Franchise Agreement between RRF and Varahi Hotels	duplicate
PX327	RRI Unredacted 002705-RRI Unredacted 002740	RRI Unredacted 002705-RRI Unredacted 002740.pdf	2015/01/20 Unredacted Minutes of Annual Meeting of the Sole Shareholder RRI Canada and RRI Financial	Replace redacted copy - AEO

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX328	RRI Unredacted 002705-RRI Unredacted 002740	Park Exhibit No. 334.pdf	2015/01/20 Unredacted Minutes of Annual Meeting of the Sole Shareholder RRI Canada and RRI Financial	Replace redacted copy - AEO
PX329	RRI Unredacted 002741-RRI Unredacted 002753	RRI Unredacted 002741-RRI Unredacted 002753.pdf	2014/01/13 Unredacted Minutes of Annuals Meeting of the Sole Shareholder RRI	Replace redacted copy - AEO
PX330	RRI unredated 000677-RRI unredated 000721	Park Exhibit No. 337.pdf	Unredacted 2010/11/11 RRI Franchise Agreement between RRF and Druid Hills	duplicate
PX331	RRI WK 00000832- RRI_WK_00000836	Moyer 124.pdf	2012/06/22 Complaint from Karesma Hendrix email	
PX332	RRI WK 00004869- RRI_WK_00004870	Patel 287.pdf	2012/06/22 District 11 Analysis Email from Bob Patel	
PX333	RRI WK 00004955	Moyer 115.pdf	2013/11/12 Email from Jay Moyner	duplicate
PX334	RRI WK 00045442- RRI WK 00045446	Limbert 144.pdf;p0.pdf	2016/01/21 Email from Cori Rice	duplicate

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX335	RRI WK 00045469- RRI WK 00045471	p0.pdf;Limbert 146.pdf	2016/01/22 Email from Cori Rice	duplicate
PX336	RRI WK 00050496- RRI_WK_00050507	Limbert 151.pdf;p0.pdf	2016/02/18 RRI Crisis Monitoring Monthly Report Jan 2016	Attorney Work Product
PX337	RRI_EF_00007425- RRI_EF_00007426	Moyer 114.pdf	2013/11/12 Notes for Budget Reviews FMC and Dune email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX338	RRI_WK00002998- RRI_WK_00002999	AlanLTallisVolII_9.p df	2017/08/10 Email and Documents from Conference Call	
PX339	RRI_WK-00004265- RRI_WK_00004266	Patel 275.pdf	2016/01/29 Police Officer Needed at RRI Smyrna	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX340	RRI_WK-00004270- RRI_WK_00004271	Patel 277.pdf	2016/02/02 Service Manager Task Assigned p Wylene Myers email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX341	RRI_WK_00000134- RRI_WK_00000135	RE Human Trafficking Training - Franchise 1.23.19.docx.msg	2019/01/24 RRI Emails about human trafficking training	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)
PX342	RRI_WK_00000412- RRI_WK_00000415	ECPATUSA_hotelcompanyimplementationprintRedRoof.pdf	ECPAT USA Hotel Company Code Implementation	Authenticity; Foundation
PX343	RRI_WK_00000416- RRI_WK_00000417	Protection of the Rights of Children Policy.docx	RRI Protection and Rights of Children Policy	Authenticity; Foundation
PX344	RRI_WK_00000419- RRI_WK_00000421	FW Red Roof Inn - Atlanta - Smyrna - MICHAEL COMPANY - Satisfaction Survey Results.msg	2017/06/05 RRI Emails - Satisfaction Survey Results	
PX345	RRI_WK_00000422	Human Trafficking.msg	2017/12/20 RRI Email regarding human trafficking recorded webinar	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX346	RRI_WK_00000423- RRI_WK_00000455	Preventing and Reacting to Child Sex Trafficking (corporate and franchise for 9.17.14).pptx	Preventing and Reacting to Child Sex Trafficking (Corporate and Franchise)	duplicate
PX347	RRI_WK_00000548- RRI_WK_00000609	Patel 163.pdf	2016/01/28 Do Not Rent List	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX348	RRI_WK_00000610- RRI_WK_00000611	Patel 276.pdf	2016/01/29 Email Re: Part Time Slot	duplicate
PX349	RRI_WK_00000612- RRI_WK_00000613	Patel 279.pdf	2016/09/01 One Call Resolution Case Created for Keniefah Martin	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX350	RRI_WK_00000614- RRI_WK_00000615	Patel 281.pdf	2017/06/26 One Call Resolution Case Created for Phillip Vasseur	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX351	RRI_WK_00000780- RRI_WK_00000781	Re SECURITY TA REVIEWS .msg	2016/10/11 RRI Emails re Trip Advisor Reviews	
PX352	RRI_WK_00000791- RRI_WK_00000794	Moyer 116.pdf	2012/08/15 July/July YTD Results email	
PX353	RRI_WK_00000817- RRI_WK_00000820	Re Red Roof Inn - Atlanta (Buckhead) - JAGUAR EISELE - Satisfaction Survey Results.msg	2012/11/10 Red Roof Inn- Atlanta (Buckhead)- Jaguar Eisele- Satisfaction Survey Results	
PX354	RRI_WK_00000817- RRI_WK_00000828	Moyer 121.pdf	2012/11/10 Red Roof Inn- Atlanta (Buckhead)- Jaguar Eisele- Satisfaction Survey Results	duplicate
PX355	RRI_WK_00000829- RRI_WK_00000831	Moyer 123.pdf	2012/12/17 Renee Huber Satisfaction Survey Results	
PX356	RRI_WK_00000897- RRI_WK_00000900	Moyer 132.pdf	2017/04/17 Buckhead Security Officer Activity Report	
PX357	RRI_WK_00000903	Moyer 133.pdf	2017/11/13 RR Plus Case for Dijon Rice	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX358	RRI_WK_00000905- RRI_WK_00000906	RE Changes to Age and Payment Check In Requirements.msg	2017/12/27 RRI Emails re Age and Payment Check in Requirements	
PX359	RRI_WK_00000907	CCCashAgeCancellation R6.xlsx	Excel Sheet CC or Cash/Cancellation Policy	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX360	RRI_WK_00001234- RRI_WK_00001237	Lam 006.pdf	RRI 88 Smyrna YTD Summary, Executive Summary emails	
PX361	RRI_WK_00001235- RRI_WK_00001237	FW TOUR NOTES - ATLANTA INNS .msg	2016/03/19 RRI Emails - Tour Notes	
PX362	RRI_WK_00001245- RRI_WK_00001257	BOTTOM 20% PRESENTATION RALEIGH, NC V. LAM 10.5.2016.pptx;BOT TOM 20%25 PRESENTATION RALEIGH, NC V. LAM 10.5.2016.pptx	2016/10/05 RRI Bottom 20% Presentation	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX363	RRI_WK_00001361- RRI_WK_00001363	Bad Apples Chicago_88 Smyrna_SChandler F11.pptx	RRI Bad Apples List	
PX364	RRI_WK_00001392	Fwd Training and ECPAT.msg	2015/12/14 Sarkisian Email	
PX365	RRI_WK_00001718	Training and ECPAT.msg	2015/12/08 Sarkisian Email re Training and ECPAT	
PX366	RRI_WK_00001721- RRI_WK_00001722	Re Training and ECPAT.msg	Dec 2015 Emails Re: Training and ECPAT	
PX367	RRI_WK_00001723	Fwd Training and ECPAT.msg	2015/12/14 Sarkisian email	
PX368	RRI_WK_00001752- RRI_WK_00001778	Red Roof Inn - MIT Training-3-23- 2008.ppt	2008/03/23 General Manager Training Safety and Security Presentation	
PX369	RRI_WK_00001779- RRI_WK_00001790	Moyer 106.pdf	2008/01/17 Safety Services Agreement	
PX370	RRI_WK_00001791- RRI_WK_00001803	2022-01-19 - Hamilton- 4.pdf;011922- Hamilton-4.pdf	2011/03/10 Safety Services Agreement	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX371	RRI_WK_00002385- RRI_WK_00002386	FW Dorraine's request for LP6 Information.msg	2011/04/05 LP6 Info Email re Asset Review Comments	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403
PX372	RRI_WK_00002388- RRI_WK_00002475	LP 6 Asset Review Comments on asset summaries from VPOs 3-18-2011.docx	2011/03/18 LP6 VPO Comments on Assets	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403
PX373	RRI_WK_00002476	Asset Summaries - Bear Floater - LP VI updated Master 3-11-2011.xlsx	2011/03/11 Asset Summaries List	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403
PX374	RRI_WK_00002477- RRI_WK_00002479	Review Alert for Red Roof Inn Atlanta North and more.msg	2013/07/12 Trip Advisor Review Alert for RRI Atl North	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX375	RRI_WK_00002480- RRI_WK_00002481	Mid Month NR - October.msg	2013/10/18 Email Mid Month NR - October	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX376	RRI_WK_00002514- RRI_WK_00002602	Alexander 308.pdf	2014/09/04 Reputology Monitor Review Summaries - Red Roof Inn Daily Summary	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX377	RRI_WK_00002545- RRI_WK_00002557	You have 58 new reviews.msg	2014/09/24 Reputology Monitor Review Summaries - Red Roof Inn Daily Summaries	duplicate
PX378	RRI_WK_00002604	Trafficking-one example at Red Roof Inn.msg	2015/12/04 Sarkisian Email re Trafficking at Red Roof Smyrna	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX379	RRI_WK_00002651- RRI_WK_00002652	FW Trafficking-one example at Red Roof Inn.msg	2015/12/04 Email from Alexander to Hugh Forwarding Sarkisian Email re Trafficking at Red Roof Smyrna	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX380	RRI_WK_00002699- RRI_WK_00002701	Press Release.msg	2018/01/16 Email Re: Press Release	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX381	RRI_WK_00002843	RRI Crisis Moniotring_Top Properties_May-December 2015.xlsx	RRI Crisis Monitoring Top Priorities May-December 2015	Privilege; relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (redact unrelated properties and Varahi conduct)
PX382	RRI_WK_00002844- RRI_WK_00002854	2015 RRI Crisis Monitoring Report_May-December 2015.pdf	RRI Crisis Monitoring Report May-December 2015	Privilege; relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (redact unrelated properties and Varahi conduct)
PX383	RRI_WK_00002901- RRI_WK_00002904	Lam 020.pdf	2017/01/19 Email from Vickie Lam	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (redact unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX384	RRI_WK_00002998- RRI_WK_00002999	Red Roof-2200 Corporate Plaza.msg	2017/08/10 Email from Jeffrey Adcock to Greg Stocker, Vickie Lam, et al. re: Red Roof 2200 Corporate Plaza	
PX385	RRI_WK_00002998- RRI_WK_00003007	Lam 017.pdf	2017/08/10 Email from Jeffrey Adcock to Greg Stocker, Vickie Lam, et al. re: Red Roof 2200 Corporate Plaza	duplicate
PX386	RRI_WK_00003000	Red Roof 2016 Incident Offense Report.xls	Red Roof 2016 Incident Offense Report- RRI Smyrna	Privilege; relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (redact unrelated properties and Varahi conduct)
PX387	RRI_WK_00003001	Windy Hill Hotel Chart Comparison.docx	Crime comparison chart at hotels in Windy Hill	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated hotel)
PX388	RRI_WK_00003002	Red Roof 2017- 081017.xls	Crimes Listing at RRI-Smyrna	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX389	RRI_WK_00003003	mossberg.JPG	Photograph of weapons and Drugs	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403
PX390	RRI_WK_00003004	Red Roof 2016 Arrest Report.xps	RRI-Smyrna Arrest Reports in 2016	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX391	RRI_WK_00003005- RRI_WK_00003007	Red Roof Abatement Request Memo-020317-Final.doc	2017/02/03 RRI Smyrna Nuisance Abatement Request Memo	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX392	RRI_WK_00003033	Patel 282.pdf	2017/09/18 Employee Meeting Notes Smyrna	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX393	RRI_WK_00003800	FW Red Roof Guest Complaints.msg	2020/04/16 RRI Guest Complaints Email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)
PX394	RRI_WK_00003801	Negative Case Extract- 2016.xlsx	2016 Negative Case Extract List	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties and Varahi conduct)
PX395	RRI_WK_00003802	Copy of 2015 Guest Relations cases 88 and 130.xlsx	2015 Guest Relations List	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties and Varahi conduct)
PX396	RRI_WK_00003803	Copy of 2014 Guest Relations cases 88 and 130.xlsx	2014 Guest Relations List	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties and Varahi conduct)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX397	RRI_WK_00003804	Copy of 2016 Guest Relations cases 88 and 130.xlsx	2016 Guest Relations List	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties and Varahi conduct)
PX398	RRI_WK_00003810- RRI_WK_00003811	Human Trafficking Investigative Protocol June 2020 Selections.docx	June 2020 Human Trafficking Investigative Protocol	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX399	RRI_WK_00004146- RRI_WK_00004171	Human Trafficking Investigative Protocol Summary and Recommendations FINAL November 2020.pptx	Human Trafficking Investigative Protocol Summary and Recommendations, November 2020	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)
PX400	RRI_WK_00004225	RE Prostitutes.msg	2014/04/29 Email re Prostitutes	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX401	RRI_WK_00004225	Patel 268.pdf	2014/04/29 Email re Prostitutes	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX402	RRI_WK_00004227- RRI_WK_00004245	RE You have 58 new reviews.msg	2014/09/24 Email regarding Review and Response Needed from F. Castille or B. Patel	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX403	RRI_WK_00004227- RRI_WK_00004245	Lam 002.pdf	2014/09/24 Emails between Bob Patel and Vickie Lam	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX404	RRI_WK_00004227- RRI_WK_00004245	Patel 002.pdf	2014/09/24 Emails about Guest Review	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX405	RRI_WK_00004246- RRI_WK_00004247	Patel 289.pdf	2014/10/21 Email Negative case Created for #88 Smyrna	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX406	RRI_WK_00004248- RRI_WK_00004250	RE GR Alert - NEGATIVE Case Created for 088Atlanta - Smyrna.msg	2014/10/21-22 Emails re Negative Case and Reclass	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX407	RRI_WK_00004248- RRI_WK_00004296	Lam 003.pdf	2014/10/22 Emails between Bob Patel and Vickie Lam	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX408	RRI_WK_00004251- RRI_WK_00004252	RE Service Manager Task Assigned - Shalandria Detry.msg	2015/12/22 Email Re: Service Manager Task Assigned	
PX409	RRI_WK_00004253	Patel 260.pdf	2016/01/22 Police Officer Help Needed at RRI Smyrna	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX410	RRI_WK_00004295- RRI_WK_00004296	RE Service Manager Task Assigned - Tracey Strickland.msg	2016-04-15 Email Re: Negative Review RRI Smyrna	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX411	RRI_WK_00004295- RRI_WK_00004296	Patel 278.pdf	2016/04/15 Service Manager Task Assigned -	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX412	RRI_WK_00004297- RRI_WK_00004303	Patel 262.pdf	2014/04/10 Legal Notice from Cobb County emails	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX413	RRI_WK_00004297- RRI_WK_00004303	Patel 262.pdf	2014/04/10 Legal Notice from Cobb County emails	duplicate
PX414	RRI_WK_00004742- RRI_WK_00004746	Moyer 125.pdf	2013/10/07 Service Manager Task Assigned - Sandra Watson	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX415	RRI_WK_00004862- RRI_WK_00004865	FW Customer Satisfaction Report- FebruaryFebruary YTD.msg	2012/03 Customer Satisfaction Report February/February YTD	
PX416	RRI_WK_00004866	D11 negative comments.xls	Negative Reponses for various RRI properties	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties and Varahi conduct)
PX417	RRI_WK_00004867- RRI_WK_00004868	District 11 Quality Results 2012 YTD.docx	District 11 Quality Results 2012 YTD	
PX418	RRI_WK_00004874- RRI_WK_00004875	Red Roof Inn - Atlanta (Buckhead) - MARHONDA NORMAN - Satisfaction Survey Results.msg	2012/12/19 Norman Satisfaction Survey results	
PX419	RRI_WK_00004874- RRI_WK_00004875	Moyer 119.pdf	2012/12/19 Marhonda Norman Satisfaction Survey results	
PX420	RRI_WK_00004876- RRI_WK_00004878	Druid Hills Buckhead #130.msg	2012/12/19 Email from Michael Thomas	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX421	RRI_WK_00004879- RRI_WK_00004882	RE Druid Hills Buckhead #130.msg	2012/10/22 Re: Druid Hills Buckhead #130	
PX422	RRI_WK_00004883- RRI_WK_00004886	Moyer 120.pdf	2012/10/22 Re: Druid Hills Buckhead #130	
PX423	RRI_WK_00004900- RRI_WK_00004901	Red Roof Inn - Atlanta - Smyrna - KELLY KAMMANN - Satisfaction Survey Results.msg	2012/12/27 Kammann Satisfaction Survey Results	
PX424	RRI_WK_00004900- RRI_WK_00004901	Moyer 122.pdf	2012/11/27 Kelly Keammann Satisfaction Survey Results	
PX425	RRI_WK_00004900- RRI_WK_00004901	Patel 122.pdf	2012/11/27 Kelly Keammann Satisfaction Survey Results	
PX426	RRI_WK_00004902- RRI_WK_00004903	Moyer 123a.pdf	2012/12/17 Joseph Kraut Satisfaction Survey Results	
PX427	RRI_WK_00004952- RRI_WK_00004954	Moyer 126.pdf	2013/10/31 Emails about complaint from Tricia LeTempt	
PX428	RRI_WK_00004955	RE 2014 Budget .msg	2013/11/12 Email from Moyer re 2014 Budget	duplicate

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX429	RRI_WK_00004956	RRI130 - Red Roof PLUS+ Atlanta - Buckhead Complaint of guest at property. .msg	2015/04/25 Email re Possible Prostitution	
PX430	RRI_WK_00004957- RRI_WK_00004958	Fwd RRI130 - Red Roof PLUS+ Atlanta - Buckhead Complaint of guest at property. .msg	2015/04/26 Moyer response to Email re Possible Prostitution	
PX431	RRI_WK_00004957- RRI_WK_00004958	Moyer 127.pdf	2015/04/26 Atlanta Buckhead Guest Complaint	
PX432	RRI_WK_00004982- RRI_WK_00004986	Moyer 128.pdf	2015/12/30 Guest Relations Case Created for Scott Ernster	
PX433	RRI_WK_00004999- RRI_WK_00005001	Moyer 129.pdf	2016/06/14 Guest Relations Case Created for John Foster	
PX434	RRI_WK_00005020	Kyle Miller .msg	2016/09/16 Email re Guest Complaint	
PX435	RRI_WK_00005021- RRI_WK_00005025	RE Kyle Miller .msg	2016/09/16 Email re Guest Complaint	



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX436	RRI_WK_00005021- RRI_WK_00005055	Moyer 131.pdf	2016/09/16 Kyle Miller Review Guest Relations	
PX437	RRI_WK_00005226- RRI_WK_00005227	Clarabridge Comment Reports.msg	Clarabridge Guest Survey Comments- keywords	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403(unrelated properties)
PX438	RRI_WK_00005228	Comment List - July 2015.xlsx	July 2015 Survey Comments	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties and Varahi conduct)
PX439	RRI_WK_00005229	Comment List - September 2015.xlsx	Comment List September 2015	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties and Varahi conduct)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX440	RRI_WK_00005230	Comment List - August 2015.xlsx	Comment List August 2015	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties and Varahi conduct)
PX441	RRI_WK_00005242	RRI Crisis Monitoring Monthly Report - July to October, 2015.msg	2015/12/13 Email regarding crisis monitoring monthly report	Privilege
PX442	RRI_WK_00005243- RRI_WK_00005251	RRI Crisis Monitoring Monthly Report - July to October.pptx	RRI Crisis Monitoring Monthly Report July 2015 - October 2015	Privilege
PX443	RRI_WK_00005252	FW RRI Crisis Monitoring Monthly Report - July to October, 2015.msg	2015/11/16 Crisis Monitoring Monthly Report Email	Privilege
PX444	RRI_WK_00005253- RRI_WK_00005261	RRI Crisis Monitoring Monthly Report - July to October.pptx	Crisis Monitoring Monthly Report July 2015-October 2015	Privilege

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX445	RRI_WK_00005262- RRI_WK_00005264	Important Press Release.msg	2016/01/18 Internal email re ATLTrafficking.com Press Release	
PX446	RRI_WK_00005265- RRI_WK_00005266	Fwd Press Release - Red Roof in Smyran Admits Sex Trafficking Occurs in its Rooms.msg	2016/01/22 Internal email re ATLTrafficking.com Press Release	
PX447	RRI_WK_00005267- RRI_WK_00005268	RE All Atlanta Properties Need Immediate Attention.msg	2016/01/22 Email re Atlanta properties Needing Immediate Attention	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (redact unrelated properties)
PX448	RRI_WK_00005269- RRI_WK_00005271	Lam 010.pdf	2016/01/22 Email Re: All Atlanta Properties Need Immediate Attention	duplicate?

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX449	RRI_WK_00005286- RRI_WK_00005288	Fwd What is your response to Human Trafficking at Cobb County Red Roof Inn on Windy Hill.msg	2016/01/29 Email re Response to Human Trafficking at RRI Smyrna	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (redact unrelated properties and Varahi conduct)
PX450	RRI_WK_00005314- RRI_WK_00005324	2015 RRI Crisis Monitoring Report_May-December 2015.pdf	Crisis Monitoring Report May-December 2015	Privilege
PX451	RRI_WK_00005325- RRI_WK_00050536	McDonald 301.pdf	2016/07/01 CX Studio dashboard email from Cheryl Billo	Privilege
PX452	RRI_WK_00005326	Crisis Monitoring Dashboard - New_07012016 900 AM.pdf	2016/07/01 Crisis monitoring Information dashboard	Privilege
PX453	RRI_WK_00005446	Crisis Grid.msg	2015/12/03 Email re Crisis Grid	
PX454	RRI_WK_00005447	RRI CRIMINIAL MASTER GRID.XLSX	RRI Criminal Master Grid	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX455	RRI_WK_00005478- RRI_WK_00005479	UPDATE Red Roof Caves...or Did They.msg	2016/02/03 Email re ATL Trafficking article	
PX456	RRI_WK_00005485- RRI_WK_00005490	Cobb County Attorney's office.pdf	2017/04/07 Cobb Co. Notice of Possible Public Safety Nuisance and Meeting Report	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), hearsay

Exhibit Number	Bates Number	Filename/Deposition Exhibit	Description	Defendants' Objections
PX457	RRI_WK_00005586	12.31.2015 (unable to convert to PDF due to document format) RRI Crisis Monitoring_Top 10 Pro (1).xlsx;12.31.2015 (unable to convert to PDF due to document format) RRI Crisis Monitoring_Top (1).xlsx;12.31.2015 (unable to convert to PDF due to document format) RRI Crisis Monitoring_Top .xlsx;12.31.2015 (unable to convert to PDF due to document format) RRI Crisis Monitoring_Top 10 Pro.xlsx	2015/12/31 Crisis Monitoring Top Properties	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX458	RRI_WK_00005587	Anonymous Caller RRI #088.msg	2016/01/21 Email re Anonymous Caller re Sex Trafficking at RRI Smyrna	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX459	RRI_WK_00005613- RRI_WK_00005614	Lam 015.pdf	2016/12/28 RRI 88 Smyrna	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX460	RRI_WK_00005659	Bad Apple Slides_Region F11.msg	2017/10/02 Email Bad Apple Slides	duplicate
PX461	RRI_WK_00005669- RRI_WK_00005671	Bad Apples SEPT 2017_88 Smyrna_SChandler F11.pptx	September 2017 Bad Apples List	duplicate
PX462	RRI_WK_00005763- RRI_WK_00005764	MacDonald 293.pdf	2011/11/11 Red Roof OCTober 2011 Activity Report email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX463	RRI_WK_00005964- RRI_WK_00005965	Calfee Report on Ohio Government February 2012.msg	2012/02/08 Ohio Governor State of the State email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX464	RRI_WK_00005966- RRI_WK_00005967	OH&LA Recap of Columbus Meeting 2.9.12.msg	2012/02/15 Recap of Columbus Meeting email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403(unrelated properties)
PX465	RRI_WK_00005968	FW Red Roof January 2012 Monthly Activity Report.msg	2012/02/16 January 2012 Monthly PR Report email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX466	RRI_WK_00006026- RRI_WK_00006028	RE Google Alert - red roof inn.msg	2012/02/19 Google Alert email re Crisis Escalation	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX467	RRI_WK_00011307- RRI_WK_00011315	<a href="https://ecf.ncwd.uscourts.gov/cgi-bin/show_temp.pl_file=2609388-1-17813.pdf&amp;type=appl">https://ecf.ncwd.uscourts.gov/cgi-bin/show_temp.pl_file=2609388-1-17813.pdf&amp;type=appl</a> .pdf	2015/09/02 Affidavit of Shawnda Drummond re RRI Charlotte, NC Property	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties) and inadmissible hearsay
PX468	RRI_WK_00011787- RRI_WK_00011846	Moyer 107.pdf	2010/11/29 Email about Safety & Security course	
PX469	RRI_WK_00011859- RRI_WK_00011903	2012 InnSider for GSRs.pdf	2012 RRI GSR Insider	
PX470	RRI_WK_00012068	250 CC Request.msg	2014/03/26 Request for CC policy email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX471	RRI_WK_00012069- RRI_WK_00012070	Fwd Today's Clips.msg	2014/06/25 Today's Clips email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX472	RRI_WK_00012358- RRI_WK_00012360	RE Google Alert - red roof inn, news.msg	2015/11/16 Google Alert email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX473	RRI_WK_0012585- RRI_WK_0012587	Moyer 130.pdf	2016/09/01 Buckhead reclass email	
PX474	RRI_WK_00012915	Google Alert - Red Roof Inn.msg	2013/06/09 Google Alerts email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX475	RRI_WK_00013089- RRI_WK_00035224	MacDonald 303.pdf	Composite of news articles and Email clips used at the MacDonald Deposition	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX476	RRI_WK_00013148- RRI_WK_00013152	RED ROOF WEEKLY REPORT, September 30 - October 4.msg	September 30 - October 4, 2013 RR Weekly Report email	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX477	RRI_WK_00013153- RRI_WK_00013155	Today's Clips.msg	2016/10/10 Today's Clips email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX478	RRI_WK_00013391- RRI_WK_00013392	RE Media Hotline Call -- fu on alleged rape from 1127.msg	2013/12/05 Media hotline call email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX479	RRI_WK_00013502- RRI_WK_00013504	RE ECPAT .msg	2014/03/06 Email re: ECPAT and training	
PX480	RRI_WK_00013666	Media Hotline Calls.msg	2014/04/28 Media Hotline Calls email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX481	RRI_WK_00013667	Google Alert - Red Roof Inn.msg	2014/04/30 Google Alert RRI Email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX482	RRI_WK_00014056- RRI_WK_00014058	RE Today's Clips.msg	2014/06/25 Re: Today's Clips email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX483	RRI_WK_00014215	Google Alert - Red Roof Inn.msg	2014/11/16 Google Alerts email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX484	RRI_WK_00014486	RE Media hotline call.msg	2015/05/01 Media hotline call email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX485	RRI_WK_00014780- RRI_WK_00014789	MacDonald 292.pdf	2015/09/15 Email about Training Videos	
PX486	RRI_WK_00014791- RRI_WK_00014792	Hotel Training Outline.pdf	Hotel Training Video Outline	
PX487	RRI_WK_00014828- RRI_WK_00014829	FW WSOC-TV request - Federal investigation into Clt franchise.msg	2015/09/16 WSOC-TV email in regard to RRI's termination of Charlotte franchise	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX488	RRI_WK_00014846- RRI_WK_00014847	Today's Clips.msg	2015/09/18 Today's clips email	
PX489	RRI_WK_00015030- RRI_WK_00015069	MacDonald 299.pdf	2015/10/13 Emails about October reviews	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX490	RRI_WK_00015110	MacDonald 297.pdf	2015/10/13 Emails about October reviews	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX491	RRI_WK_00015681- RRI_WK_00015682	Today's Clips.msg	2015/10/21 Today's clips email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX492	RRI_WK_00015907- RRI_WK_00015910	Re Assistance needed.msg	2016/01/14 Email re Assistance needed- 2016 RRI Crisis Training Presentation	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403
PX493	RRI_WK_00015911- RRI_WK_00015932	2016 RRI Crisis Training Presentation v8.0.pdf	2016 Crisis Communications Training Presentation	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX494	RRI_WK_00015978- RRI_WK_00015979	FW All Atlanta Properties Need Immediate Attention.msg	2016/01/22 Atlanta RRI need attention email	
PX495	RRI_WK_00015978- RRI_WK_00015979	MacDonald 295.pdf	2016/01/22 Emails about Atlanta properties and complaints	
PX496	RRI_WK_00015980- RRI_WK_00015988	RED ROOF WEEKLY REPORT January 18 – January 22, 2016.msg	2016/01/18-22 Weekly Report	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403(unrelated properties)
PX497	RRI_WK_00016329	Google Alert - Red Roof Inn.msg	2016/08/25 Google Alert email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX498	RRI_WK_00018256	Today's Clips.msg	2016/05/06 Today's clips email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX499	RRI_WK_00018312- RRI_WK_00018331	Guest_Relations_Presentation by Vickie.ppt	Medallia & Guest Relations Presentation	
PX500	RRI_WK_00018430- RRI_WK_00018433	Fwd Red Roof Inn - Atlanta Midtown - JUSTIN RILEY - Satisfaction Survey Results.msg	2016/01/14 Justin Riley Satisfaction Survey Results email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX501	RRI_WK_00018555- RRI_WK_00018557	RE Need to put this guest in national DNR Fraud payments.msg	2016/01/19 National DNR Fraud payments email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX502	RRI_WK_00020959- RRI_WK_00020963	Re Did we stay at the seacucus RRI.msg	2012/07/24 NJ Red Roof Email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX503	RRI_WK_00020970- RRI_WK_00020973	Travel Risk Management Conference Focusing on Corporate & Government Travel.msg	2012/07/26 Travel Risk Management Conference email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX504	RRI_WK_00022150- RRI_WK_00022155	Re Meeting on Friday, Suggested Agenda.msg	2012/09/15 Suggested Agenda Email	
PX505	RRI_WK_00022156- RRI_WK_00022157	RE Questions from Star Tribune-Privileged Confidential.msg	2012/09/18 Email Re: Questions from Star Tribune	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX506	RRI_WK_00031069- RRI_WK_00031076	Moyer 118.pdf	2012/09/17 Memphis Ranking in 2012 email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX507	RRI_WK_00035083- RRI_WK_00035084	Google Alert - Red Roof Inn.msg	2018/01/30 Google Alerts email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX508	RRI_WK_00038055- RRI_WK_00038057	e-Pak 3.30.2012 Continuing Ed, April promotions_ April 2012 Pet Friendly_ Human trafficking_ golden shovel contest_ WIS memo_ February 2012 Inn rankings.msg	2012/03/30 Weekly e- Pak for 3.30.12 email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX509	RRI_WK_00038058- RRI_WK_00038077	e-Pak 3.30.2012.pdf	2012/03/30 e-Pak	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX510	RRI_WK_00038264- RRI_WK_00038265	085 Columbia W, SC Employee Complaint.msg	2018/06/06 085 Columbia W, SC Complaint email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX511	RRI_WK_00043387- RRI_WK_00043388	Fwd RRI Framingham.msg	2013/08/02 Framingham email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX512	RRI_WK_00043390- RRI_WK_00043391	20130802111238323.pdf	2013/08/02 Letter from Hackett re RRI-Framingham	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX513	RRI_WK_00043415- RRI_WK_00043416	ATTORNEY CLIENT PRIVELEGED -- CONFIDENTIAL.msg	2015/12/04 Email forwarding Sarkisian email	Cumulative and attorney-client privileged
PX514	RRI_WK_00043418- RRI_WK_00043460	Red Rood Inn Smyrna GA - Oct 2015 - Copy.doc	2015 RRI Smyrna Customer Reviews- Trip Advisor	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX515	RRI_WK_00043564- RRI_WK_00043565	FW City of Columbus.msg	2017/12/28 Fw: City of Columbus email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX516	RRI_WK_00043566	Scan0238.pdf	2017/12/18 Columbus OH Nuisance Abatement letter	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX517	RRI_WK_00045005- RRI_WK_00045006	FW Google Alert - red roof inn.msg	2015/09/23 Google Alert email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX518	RRI_WK_00045012- RRI_WK_00045013	ATTORNEY CLIENT PRIVELEGED -- CONFIDENTIA.msg	2015/12/04 RRI Smyrna email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX519	RRI_WK_00045060- RRI_WK_00045061	FW Trafficking-one example at Red Roof Inn.msg	2015/12/22 Smyrna RRI email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX520	RRI_WK_00045063- RRI_WK_00045105	Red Rood Inn Smyrna GA - Oct 2015 - Copy.doc	October 2015 RRI Customer Reviews- TripAdvisor	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX521	RRI_WK_00045107	ATT00001.htm	2015/12/04 Sarkisian email	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX522	RRI_WK_00045335- RRI_WK_00045336	All Atlanta Properties Need Immediate Attention.msg	2016/01/19 Email concerning all Atlanta RRI properties	
PX523	RRI_WK_00045693- RRI_WK_00045698	FW ECPAT-USA Tourism Child- Protection Code Follow-Up.msg	2016/06/28 ECPAT Tourism Child- Protection Code Follow- Up email	
PX524	RRI_WK_00045841- RRI_WK_00045842	Re RRI793 Atlanta Six Flags, GA --- Safety and Risk.msg	2017/04/05 RRI 793 Atlanta Six Flags email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX525	RRI_WK_00045856- RRI_WK_00045857	FW legal notice - RRI #88 Smyrna, GA .msg	2017/04/18 Email from Vickie Lam to George Limbert et al re Cobb County Attorney's office.pdf	
PX526	RRI_WK_00045858- RRI_WK_00045863	Cobb County Attorney's office.pdf	2017/04/07 Cobb County Notice of Possible Public Safety Nuisance and Meeting Request	Inadmissible hearsay

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX527	RRI_WK_00045910	BEST - Inhospitable to Human Trafficking.msg	2017/06/26 Email regarding trafficking training	
PX528	RRI_WK_00045963	RRI #88 Smyrna, GA - Officer Jeffrey Adcock (Abatement Concerns).msg	2017/08/09 Smyrna Officer Adcock's abatement concerns email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX529	RRI_WK_00045993- RRI_WK_00045994	RRI #85 Columbia, SC - Follow Up to Visit .msg	2017/12/07 RRI #85 Columbus, SC Follow Up to Visit email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX530	RRI_WK_00046570- RRI_WK_00046572	FW Motel 'frequently involved in criminal activity' sees more than 200 calls for service this year - abcactionnews.com WFTS-TV.msg	2018/11/04 ABC Action News email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX531	RRI_WK_00046582- RRI_WK_00046584	Re Motel 'frequently involved in criminal activity' sees more than 200 calls for service this year - abcactionnews.com WFTS-TV.msg	2018/11/04 Email Re: ABC Action News	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX532	RRI_WK_00047523- RRI_WK_00047524	FW ECPAT-USA Rubric Report - Red Roof Inns.msg	2019/08/13 ECPAT USA Rubric Report email	
PX533	RRI_WK_00047525- RRI_WK_00047527	ECPAT-USA Rubric Report_Red Roof Inns.pdf	ECPAT Rubric Report	
PX534	RRI_WK_00047614- RRI_WK_00047617	RE FYI RRI085 Columbia West, SC Police Department Called.msg	2017/10/28 RRI 085 Charlotte Airport email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX535	RRI_WK_00047887- RRI_WK_00047890	Fwd 131 Jackson Fairgrounds Possible Human Trafficking-Privileged .msg	2018/03/23 131 Jackson Fairgrounds email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX536	RRI_WK_00048061	Agenda for Next Week.msg	2018/11/09 RR Brand Health Meeting Agenda email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)
PX537	RRI_WK_00048062	111318- Red Roof Brand Health Meeting Agenda.pdf	2018/11/13 Red Roof Brand Health Meeting Agenda	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)
PX538	RRI_WK_00048265	Incident Report ~ Inn #88 ~ Chanee Norris 9712.msg	2012/09/07 Inn 88 Incident Report email	
PX539	RRI_WK_00048266- RRI_WK_00048267	9-7-12 Chanee Norris.docx	2012/09/07 Chanee Norris Preliminary Liability Incident Report	
PX540	RRI_WK_00048407- RRI_WK_00048408	RE Google Alert - Red Roof Inn.msg	2014/06/11 Re; Google Alert Nashville RRI	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX541	RRI_WK_00048409- RRI_WK_00048410	Nashville Airport, Tn - Inn 10206 - prostitution 6-11-14.doc	2014/06/11 Nashville Airport Preliminary Liability Incident Report	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX542	RRI_WK_00050252- RRI_WK_00050260	PowerPoint Presentation;RRI Crisis Monitoring Monthly Report - July to October FINAL.pptx	July 2015 - Oct 2015 Crisis Monitoring Monthly Report	Privilege
PX543	RRI_WK_00050261- RRI_WK_00050262	RE RRI Crisis Monitoring Monthly Report - July to October, 2015.msg	2015/11/18 Re: Crisis Monitoring Monthly Report email	Privilege
PX544	RRI_WK_00050339- RRI_WK_00050340	RRI Crisis Monitoring Monthly Report - July to October, 2015.msg	2015/11/23 Crisis Monitoring Monthly Report - July to Oct 2015	Privilege
PX545	RRI_WK_00050339- RRI_WK_00050340	MacDonald 296.pdf	2015/11/23 Emails about July to Oct 2015 Crisis Monitoring Monthly Report	Privilege



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX546	RRI_WK_00050397- RRI_WK_00050405	PowerPoint Presentation;RRI Crisis Monitoring Monthly Report - November-FINAL.pdf	Nov 2015 Crisis Monitoring Monthly Report	Privilege
PX547	RRI_WK_00050437	RRI Crisis Monitoring_Nov Top Properties.xlsx	RRI Crisis Monitoring List- November Top Properties	Privilege
PX548	RRI_WK_00050475- RRI_WK_00050476	MacDonald 298.pdf	2016/01/21 Emails about May to Dec 2015 Crisis Monitoring Report	Privilege
PX549	RRI_WK_00050482- RRI_WK_00050495	Limbert 150.pdf;p0.pdf	2016/02/02 Email from Karen Zhu	
PX550	RRI_WK_00050498- RRI_WK_00050507	RRI Crisis Monitoring Report_January 2016.pdf;PowerPoint Presentation	Jan 2016 Crisis Monitoring Report	Privilege
PX551	RRI_WK_00050509	RRI Crisis Monitoring_Top Properties_May-December 2015.xlsx	May-Dec 2015 RRI Crisis Monitoring Top Properties	Privilege

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX552	RRI_WK_00050536	Crisis Monitoring Dashboard - New_07012016 900 AM.pdf	2016/07/01 Crisis Monitoring Dashboard	Privilege
PX553	RRI_WK_00050688	#793-Six Flags.msg	2019/02/07 Atlanta Six Flags worst property in chain email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX554	RRt_WK_00050691- RRI_WK_00050699	MacDonald 302.pdf	YTD All Brands - Ranker	
PX555	RRI_WK_00050752	Top 10 Properties .xlsx	Top 10 Properties List	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX556	RRI_WK_00050853- RRI_WK_00050857	Feb. 1, 2012 The dawning of a comprehensively new day for Hilton's breakfast program.msg	2012/02/01 Hilton's breakfast program email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated hotel)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX557	RRI_WK_00050866- RRI_WK_00050867	Re Google Alert - red roof inn.msg	2012/02/21 Email Re - Google Alert	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX558	RRI_WK_00050890	St Louis-Forest Park Notice.msg	2012/08/28 St Louis Park Notice email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX559	RRI_WK_00050891- RRI_WK_00050893	20120828142825738.pdf	2012/08/22 St Louis Public Nuisance Notice	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX560	RRI_WK_00050960- RRI_WK_00050968	McDonald 294.pdf	2013/03/02 Email Re: Red Roof Weekly Report	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX561	RRI_WK_00050960- RRI_WK_00050968	MacDonald 294.pdf	2013/03/02 Red Roof Weekly Report emails	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX562	RRI_WK_00051792- RRI_WK_00051793	Alexander 309.pdf	2015/12/04 Smyrna Operational Summary emails	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX563	RRI_WK_00054424- RRI_WK_00054431	RRI 140 Lafayette LA Notice of Multiple Default 06.20.19.pdf	2019/06/20 Red Roof Letter to Imran Ali re: Notice of Multiple Defaults Relating to Red Roof Inn #140	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX564	RRI_WK_00065018- RRI_WK_00065019	MacDonald 304.pdf	2016/03/09 Email about sex trafficking in Maryland	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX565	RRI_WK_00065387- RRI_WK_00065388	Google Alert - Red Roof Inn.msg	2016/12/30 Google Alert email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX566	RRI_WK_00068385- RRI_WK_00068389	RE Smyrna Property.msg	2016/01/23 Email Re: Smyrna Property	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX567	RRI_WK_00069656- RRI_WK_00069657	Miller 11.15.12.pdf	2012/11/15 Timonium Preliminary Liability Incident Report	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX568	RRI_WK_00069674- RRI_WK_00069680	City of Portland_A Guide to Crime Prevention in Overnight Lodging.pdf	City of Portland - A Guide to Crime Prevention in Overnight Lodging	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX569	RRI_WK_A0004222	Patel 267.pdf	2013/12/21 Email from Bob Patel to Lori Mead	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX570	RRIF 000381	Park Exhibit No. 345.pdf	List of Inns, Termination Dates, and Termination Reasons	
PX571	RRIF 000382-RRIF 000435	Galbraith 350.pdf	Red Roof Standards Manual	
PX572	RRIF 000495-RRIF 000550	Patel 355.pdf	Red Roof Standards Manual	duplicate
PX573	RRI_WK_00000419-RRI_WK_00000421	Patel 375.pdf	2017/06/05 Email about Smyrna RRI	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX574	RRI_WK_00002998-RRI_WK_00003007	Patel 179.pdf	2017/08/10 Email and Documents from Conference Call	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX575	RR1_WK_00004297- RR1_WK_00004303	Patel 262.pdf	2017/04/10 Emails about Cobb County Legal Notice	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX576	RR1_WK_00045005- RR1_WK_00045006	Austin 245.pdf	2015/09/23 Google Alerts email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX577	RR1_WK_00045313- RR1_WK_00045317	Limbert 142.pdf;p0.pdf	2016/01/19 Email from George Limbert	
PX578	RR1_WK_00045531- RR1_WK_00045533	Limbert 148.pdf;p0.pdf	2016/01/28 Smyrna RRI emails	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX579	RR1_WK_00046582- RR1_WK_00046584	Limbert 180.pdf	2018/11/04 Email from Marina MacDonald	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX580	RR1_WK_00046835- RR1_WK_00046837	Austin 250.pdf	2019/05/13 Email from Phil Hugh	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX581	RR1_WK_00050250- RR1_WK_00050251	Limbert 173.pdf	2015/11/16 RRI Crisis Monitoring Monthly Report - July to Oct 2015	Privilege
PX582	RR1_WK_00050250- RR1_WK_00050251	McDonald 173.pdf	2015/11/16 Email from Karen Zhu	Privilege
PX583	RR1_WK_00050866- RR1_WK_00050867	Austin 239.pdf	2012/02/21 Fw: Google Alert emails	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX584	RR1_WK_00000635- RR1_WK_00000636	Patel 380.pdf	2019/10/23 Email from Bill Hall	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking and Varahi conduct)



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX585	RR1_WK_00002604-RR1_WK_00002650	Patel 356.pdf	2015/12/04 Email from Michele Sarkisian EPCAT	
PX586	RR1_WK_00006026-RR1_WK_00006028	Austin 238.pdf	2012/02/19 Emails between Andrew Alexander and Rob Wallace	
PX587	RR1_WK_00008499-RR1_WK_00008501	Alexander 311.pdf	2013/03/06 Emails about EPCAT	
PX588	RR1_WK_00043415-RR1_WK_00043460	Limbert 138.pdf;p0.pdf	2015/12/04 RRI Smyrna Oct 2015	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX589	RR1_WK_00043466-RR1_WK_00043469	p0.pdf;Limbert 141.pdf	2015/12/24 Trafficking-one example at Red Roof Inn emails	
PX590	RR1_WK_00043560-RR1_WK_00043563	Limbert 149.pdf;p0.pdf	2016/01/26 Emails about Smyrna RRI	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX591	RR1_WK_00045335-RR1_WK_00045336	Limbert 143.pdf;p0.pdf	2016/01/09 All Atlanta Properties Need Attention email	
PX592	RR1_WK_00045342-RR1_WK_00045354	p0.pdf;Limbert 156.pdf	2016/01/20 ECPAT USA Tourism and Child-Protection Code Follow-Up email	
PX593	RR1_WK_00045693-RR1_WK_00045698	Limbert 157.pdf;p0.pdf	2016/06/28 Email Re: EPCAT-USA Tourism Child-Protection Code Follow-Up	
PX594	RR1_WK_00048061-RR1_WK_00048062	Austin 249.pdf	2018/11/09 Email from Greg Stocker	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)
PX595	RR1_WK_00050396-RR1_WK_00050414	p0.pdf;Limbert 140.pdf	2015/12/17 Email from Karen Zhu	Privilege
PX596	RR1_WK_00050510-RR1_WK_00050520	Limbert 177.pdf	May - Dec 2015 Crisis Monitoring Report	Privilege

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX597	RR1_WK_ 00050900- RR1_WK_00050903	Alexander 307.pdf	2012/09/14 Suggested Agenda email	Relevance under Rule 401
PX598	RR1_WK_ 00051842- RR1_WK_00051843	Patel 359.pdf	2015/12/24 Email from Michele Sarkisian	
PX599	RR1_WK_00031 086- RR1_WK_00031094	Austin 232.pdf	2012/08/17 Emails between Jay Moyer and Randy Fox	
PX600	RR1_EF_00003972- RR1_EF_00003973	Lam 027.pdf	Prostitution Ranker Chart	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (other hotels)
PX601	RR1_EF_00009924- RR1_EF_00009937	Lam 023.pdf	2016/10/14 Bottom 20% Presentation	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX602	RR1_EF_00010103- RR1_EF_00010104	Lam 034.pdf	2019/10/30 Emails about Fox News Article	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)
PX603	RR1_WK_00000074- RR1_WK_00000207	Alexander 305.pdf	2020/01/16 Human Trafficking Training Refresher email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)
PX604	RR1_WK_00000141- RR1_WK_00000153	Galbraith 352.pdf	2019/08/18 88 Smyrna - Franchise Visit	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)
PX605	RR1_WK_00000422	Wehrle 323.pdf	2017/12/20 Email from Steve Woodward	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX606	RR1_WK_00000548- RR1_WK_00000609	p0.pdf;Limbert 163.pdf	2016/01/28 DNR List for RRI Smyrna	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX607	RR1_WK_00000616- RR1_WK_00000617	Patel 373.pdf	2019/06/21 Guest Review Expedia Group	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking and Varahi conduct)
PX608	RR1_WK_00001359- RR1_WK_00001363	Galbraith 019.pdf	2017/02/21 Bad Apples Smyrna email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX609	RR1_WK_00001392	Alexander 310.pdf	2015/12/14 Emails about training and ECPAT	
PX610	RR1_WK_00001450- RR1_WK_00001501	Patel 265.pdf	RRI Standards Manual	duplicate
PX611	RR1_WK_00001718	Patel 357.pdf	2015/12/08 Email from Michele Sarkisian	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX612	RR1_WK_00001721	p0.pdf;Limbert 155.pdf	2015/12/10 Email Re: Training and EPCAT	
PX613	RR1_WK_00001723	p0.pdf;Limbert 139.pdf	2015/12/14 Email about Training and EPCAT	
PX614	RR1_WK_00001752- RR1_WK_00001778	Vittatoe 195.pdf	RRI General Manager Training Safety and Security Presentation	duplicate
PX615	RR1_WK_00001779- RR1_WK_00001790	Vittatoe 193.pdf	2008/01/17 Security Services Agreement	duplicate
PX616	RR1_WK_00002844- RR1_WK_00002854	Stocker 212.pdf	2015 Crisis Monitoring Report May - Dec 2015 ppt	Privilege
PX617	RR1_WK_00002938- RR1_WK_00002993	Limbert 162.pdf;p0.pdf	Safety & Security The Address Hotel Dubai 12/31/2015-1/1/2016	
PX618	RR1_WK_00003033- RR1_WK_00003036	Stocker 217.pdf	2017/09/18 RRI Smyrna Employee Meeting Notes Emails	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX619	RR1_WK_00003033- RR1_WK_00003036	Patel 217.pdf	2017/09/18 RRI Smyrna Employee Meeting Notes Emails	duplicate

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX620	RR1_WK_00003800- RR1_WK_00003801	Stocker 214.pdf	2020/04/16 Email from Chris Gordon about Red Roof Guest Complaints	
PX621	RR1_WK_00003980	Stocker 218.pdf	2020/07/15 Summary of Meeting with RRI-Smyrna	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking and Varahi conduct)
PX622	RR1_WK_00004251- RR1_WK_00004252	Patel 271.pdf	2015/12/22 Task Assignment - Shalandria Detry	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX623	RR1_WK_00004552- RR1_WK_00004554	Patel 377.pdf	2019/11/11 Response Requested, Guest Name Diamond Wiggins	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking and Varahi conduct)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX624	RR1_WK_00004559- RR1_WK_00004560	Patel 374.pdf	2019/11/17 Expedia Group review	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking and Varahi conduct)
PX625	RR1_WK_00004642- RR1_WK_00004643	Patel 378.pdf	2020/08/24 One Call Resolution Case Created for Adam Witherspoon	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking and Varahi conduct)
PX626	RR1_WK_00004680- RR1_WK_00004681	Patel 379.pdf	2020/11/16 New Guest Relations Case for Cassandra Ferguson	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking and Varahi conduct)
PX627	RR1_WK_00004874- RR1_WK_00004875	Stocker 208.pdf	2012/09/17 Marhonda Norman Satisfaction Survey Results	



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX628	RR1_WK_00004900- RR1_WK_00004901	Stocker 209.pdf	2012/11/27 Kelly Kammann Satisfaction Survey Results	
PX629	RR1_WK_00004942	Stocker 210.pdf	2013/10/07 Negative Case Created for 130 Atlanta (Buckhead)	
PX630	RR1_WK_00005242- RR1_WK_00005251	Stocker 211.pdf	2015/11/13 Email from Cori Rice	Privilege
PX631	RR1_WK_00005446- RR1_WK_00005447	Stocker 213.pdf	2015/12/03 Email from Karen Zhu	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX632	RR1_WK_00005461	Park Exhibit No. 344.pdf	2016/01/28 Statement of RRI regarding Smyrna property email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX633	RR1_WK_00005483- RR1_WK_00005490	Stocker 215.pdf	2017/04/18 Emails between Bob Patel and Kapil Handa	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX634	RR1_WK_00005968	Austin 230.pdf	2012/02/16 Jan 2012 Monthly Activity Report email	Privilege
PX635	RR1_WK_00008494- RR1_WK_00008495	Wehrle 321.pdf	2014/03/06 ECPAT email	
PX636	RR1_WK_00009323- RR1_WK_00009327	Alexander 314.pdf	2015/01/14 Email from Cheryl Billo	
PX637	RR1_WK_00011168- RR1_WK_00011306	Stocker 205.pdf	RRI Assaults Operating and Reporting Procedures- December 2010	
PX638	RR1_WK_00011660	Vittatoe 194.pdf	2007/09/01 Red Roof Hotline Numbers	
PX639	RR1_WK_00011787- RR1_WK_00011817	Vittatoe 196.pdf	2010/11/29 Emails between Michelle Wehrle and Jay Moyner	
PX640	RR1_WK_00020954- RR1_WK_00020958	Alexander 316.pdf	2012/07/24 Emails about Secaucus RRI	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX641	RR1_WK_00024101	Limbert 171.pdf	GA Code pimping	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX642	RR1_WK_00024102- RR1_WK_00024118	Limbert 168.pdf	Weekly e-Pak 2017/01/12	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (jurors need instructed on the law through jury instructions, not a proper exhibit)
PX643	RR1_WK_00031920- RR1_WK_00031937	Alexander 313.pdf	2017/12/20 Weekly e-Pak	
PX644	RR1_WK_00034098- RR1_WK_00034100	Austin 251.pdf	2019/11/04 Possible protest flier email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (post alleged period of trafficking)
PX645	RR1_WK_00034999- RR1_WK_00035013	Austin 248.pdf	2017/09/29 Red Roof Weekly Report September 25 - September 29, 2017 email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403
PX646	RR1_WK_00042263- RR1_WK_00042569	Austin 226.pdf	2020/04/01 RRI Franchise Disclosure Document	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX647	RR1_WK_00042263- RR1_WK_00042569	Park Exhibit No. 226.pdf	2020/04/01 RRI Franchise Disclosure Document	duplicate
PX648	RR1_WK_00043385- RR1_WK_00043386	McElroy 316.pdf	2013/05/30 Emails about a TV reporter	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403
PX649	RR1_WK_00043397- RR1_WK_00043398	Alexander 306.pdf	2015/05/02 Emails about media hotline call	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX650	RR1_WK_00043402- RR1_WK_00043403	Limbert 135.pdf;p0.pdf	2015/09/16 WSOC-TV Request email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX651	RR1_WK_00045472- RR1_WK_00045475	p0.pdf;Limbert 147.pdf	2016/01/22 Email from George Limbert	
PX652	RR1_WK_00045615	Limbert 152.pdf;p0.pdf	2016/03/23 Emails about Tom McElroy	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX653	RR1_WK_00045809- RR1_WK_00045810	p0.pdf;Limbert 159.pdf	2017/01/15 Email from George Limbert	
PX654	RR1_WK_00045964- RR1_WK_00045965	Stocker 216.pdf	2017/08/18 Emails between Cobb County Police Department and Vickie Lam	
PX655	RR1_WK_00047523- RR1_WK_00047527	p0.pdf;Limbert 158.pdf	2019/08/13 EPCAT- USA Rubric Report emails	
PX656	RR1_WK_00047614- RR1_WK_00047617	Park Exhibit No. 347.pdf	2017/10/28 RRI 085 Email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX657	RR1_WK_00050250- RR1_WK_00050260	Limbert 136.pdf;p0.pdf	2015/11/16 Email from Karen Zhu	Privilege
PX658	RR1_WK_00050321- RR1_WK_00050323	Limbert 137.pdf;p0.pdf	2015/11/20 Crisis Monitoring Monthly Report - July to Oct 2015	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated properties)
PX659	RR1_WK_00050426- RR1_WK_00050434	Limbert 175.pdf	Nov 2015 Crisis Monitoring Monthly Report	Privilege

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX660	RR1_WK_00050450- RR1_WK_00050481	MacDonald 300.pdf	2016/01/07 Email from Donald C. MacDonald, Jr.	Relevance (unrelated property)
PX661	RR1_WK_00050474	Patel 376.pdf	Chart of Inn, Region, Date, Categories (Police, Prostitution, Drug, Weapon), and Comment	Relevance under Rule 401 and unfair prejudice and confusion of the issues and cumulative evidence under Rule 403
PX662	RR1_WK_00050498- RR1_WK_00050507	Limbert 164.pdf	Preventing & Reacting to Child Sex Trafficking	duplicate
PX663	RR1_WK_00050498- RR1_WK_00050507	Limbert 178.pdf	Jan 2016 Crisis Monitoring Report	Privilege
PX664	RR1_WK_00050777- RR1_WK_00050779	Limbert 176.pdf	2016/01/07 Atlanta Midtown RRI Crisis Monitoring emails	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated property)
PX665	RR1_WK_00051794	Patel 358.pdf	2015/12/22 Email from Michele Sarkisian	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX666	RR1_WK_00064490- RR1_WK_00064491	Park Exhibit No. 348.pdf	2015/09/16 Re: Red Roof Statement	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated property)
PX667	RR1_WK_00064527- RR1_WK_00064535	Park Exhibit No. 346.pdf	2015/09/25 Charlotte RRI email	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated property)
PX668	RR1_WK_00068385- RR1_WK_00068389	Wehrle 322.pdf	2016/01/23 Smyrna property emails	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX669	VARAHI 000057- VARAHI 000631	Lam 007.pdf	RRI Manager in Training Manual	
PX670	VARAHI 000057- VARAHI 000631	Wehrle 324.pdf	RRI Manager in Training Manual	duplicate
PX671	VARAHI 000057- VARAHI 000631	VARAHI000057.pdf	Red Roof Manager in Training Manual	duplicate
PX672	VARAHI 00244- VARAHI 00297	Varahi 244-297.pdf	RRI Franchise Agreement	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX673	VARAHI 00244- VARAHI 00297	Patel 264.pdf	Franchise Agreement between RRF and Varahi Hotels	duplicate
PX674	VARAHI 00304- VARAHI 00878	Varahi 304-878.pdf	RRI Manager in Training Manual	
PX675	VARAHI 000632- VARAHI 000680	Patel 261.pdf	Varahi Hotels Employee Handbook	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX676	VARAHI 01010- VARAHI 01013	Varahi 1010-1013.pdf	July 2015 JD1 RRI Folio	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX677	VARAHI 01106- VARAHI 01109	Patel 361.pdf	Public Safety Nuisance Abatement Plan	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX678	VARAHI 01110	Patel 283.pdf	Sept. 2017 Public Safety Action Plan	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX679	VARAHI 01111- VARAHI 01112	Patel 362.pdf	2017/09/19 RRI Changes from Recent Abatement Notice	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX680	VARAHI 001258- VARAHI 001264	Patel 354.pdf	2012/12/31 Statistics Report	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX681	VARAHI 01317- VARAHI 01366	Patel 284.pdf	2015/12/20 Security Solutions of America Invoice Smyrna RRI	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX682	VARAHI 01367- VARAHI 01380	Patel 285.pdf	2012/12/17 Security Time Card	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX683	RRI_WK_00001879- RRI_WK_00001888; Varahi01381- Varahi01382	Patel 280.pdf	2017/04/19 Bob Patel Security Guard Protection Agreement	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX684	Westmont 002725	Park Exhibit No. 330.pdf	RRI - Dune Structure Chart	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated entities)
PX685	Westmont 002727	Park Exhibit No. 327.pdf	RRI Structure Chart	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated entities)
PX686	WHM_WK_000076- WHM_WK_000114	Park Exhibit No. 339.pdf	Dec 2014 RRI Franchise Operations Executive Summary	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX687	WHM_WK_000076- WHM_WK_000114	Franchise Ops Executive Summary December 2014.pptx	Dec 2014 Franchise Operations Executive Summary	duplicate
PX688	WHM_WK_000122	Google Alert - red roof inn.msg	2015/03/26 Google Alert email	Authentication
PX689	WK-Bliss-000083- WK-Bliss-000105	MelanieJBlissPhD_7. pdf	Melanie Bliss - Health and Mental Health Consequences from Sexual Trauma Victimizations	
PX690	WK-Tallis-000073	Tallis Materials 005.pdf	2014/04/29 Email between Walter Grayson and Bharat Patel	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX691	WK-Tallis-000074- WK-Tallis-000078	Tallis Materials 002.pdf	2016/01/23 Smyrna Property emails	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX692	WK-Tallis-000079- WK-Tallis-000085	Tallis Materials 006.pdf	2014/04/10 Legal Notice from Cobb County emails	Relevance under Rule 401, unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct), and inadmissible hearsay
PX693	WK-Tallis-000124	Preventing and Reacting to Child Trafficking — LODGING.pdf	2015/01/07 Preventing and Reacting to Child Trafficking	
PX694	WK-Tallis-000142- WK-Tallis-000148	Kimberly Ritter stands up to child sex trafficking in US hotels - CSMonitor.com.pdf	2013/03/15 The Christian Science Monitor article	
PX695	WK-Tallis-000154- WK-Tallis-000156	A hotel industry response to child trafficking – HOTELSMag.com.pdf	2013/03/11 A Hotel Industry Response to Child Trafficking article	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX696	WK-Tallis-000219- WK-Tallis-000223	Tallis Materials 003.pdf	2016/01/23 Emails about Smyrna property	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (Varahi conduct)
PX697	WK-Tallis-000234- WK-Tallis-000237	Tallis Materials 004.pdf	RRI Structure Chart	
PX698	WK-Tallis-000241- WK-Tallis-000246	Tallis Materials 009.pdf	June 2013 CPPS Georgia Human Trafficking Fact Sheet	
PX699	WK-Tallis-000256- WK-Tallis-000257	Tallis Materials 014.pdf	Tallis Handwritten Notes	
PX700	WK-Tallis-000828	AlanLTallisVoll_16. pdf	Tallis RRI, RRF Franchising	
PX701	WK-Tallis-000830- WK-Tallis-000831	Tallis Materials 064.pdf	1996/07/25 Dallas News Company article	
PX702	WK-Tallis-000854- WK-Tallis-000871	Tallis Materials 068.pdf	Polaris Project Tips for First Interactions with Victims	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX703	WK-Whitmore000001- WK-Whitmore000140;W K-Whitmore000001- WK-Whitmore000140	UN Introduction to Human Trafficking.pdf;13.pdf	UN Office on Drugs and Crime Introduction to Human Trafficking	
PX704	WK-Whitmore000141;W K-Whitmore000141	2.pdf	Polaris Project AMP Model article	
PX705	WK-Whitmore000142- WK-Whitmore000152;W K-Whitmore000142- WK-Whitmore000152	14.pdf	Fuchs, E; Flugge G. Adult Neuroplasty: More than 40 Years of Research. Neural Plasticity 2014	
PX706	WK-Whitmore000538- WK-Whitmore001014;W K-Whitmore000538- WK-Whitmore001014	4.pdf	Institute of Medicine and National Research Council article on Confronting Commercial Sexual Exploitation of Minors in the US	

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX707	WK-Whitmore001023-WK-Whitmore001028;WK-Whitmore001023-WK-Whitmore001028	11.pdf	Sanchez, R; Stark SW. The Hard Truth About Human Trafficking. Nursing Management 2014 (Jan), pp. 18-23	
PX708	WRRH 000234	WRRH 000234-WRRH 000234.pdf	RRI - Dune Structure Chart	
PX709	WRRH 000234	Austin 187.pdf	RRI - Dune Structure Chart	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403; AEO
PX710	WRRH 000235	WRRH 000235-WRRH 000235.pdf	RRI - FMC Structure Chart	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403; AEO
PX711	WRRH 000235	Austin 186.pdf	RRI - FMC Structure Chart	duplicate
PX712	WRRH 000235	Limbert 186.pdf	RRI - FMC Structure Chart	duplicate

<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX713	WRRH 000236	WRRH 000236-WRRH 000236.pdf	Red Roof Inns, Inc. Structure Chart	Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403; AEO
PX714	WRRH 000236	Austin 185.pdf	RRI Structure Chart	duplicate



<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX715	Pltf.W.K.-000352- Pltf. W.K.-000357; Pltf. W.K.-000357- Pltf. W.K.-000359; Pltf. W.K.-000363- Pltf.W.K.-000366; Pltf. W.K.-000369; Pltf. W.K.-000379- Pltf.W.K.-000407; Pltf.W.K.-000432; Pltf.W.K.-000483- Pltf. W.K.-000485; Pltf. W.K.-000487- Pltf.W.K.-000488; Pltf. W.K.-000491- Pltf. W.K.-000492; Pltf. W.K.-000533- Pltf.W.K.-000549; Pltf. W.K.-001004- Pltf. W.K.-001007; Pltf. W.K.-001011- Pltf.W.K.-001013; Pltf. W.K.-001025- Pltf. W.K.-001044	Armstead Files		Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403 (unrelated plaintiff)

PX715	Armstead Files	Public record relating to State of Ga. v. Armstead		Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403; Foundation; Authentication; Hearsay
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<b>Exhibit Number</b>	<b>Bates Number</b>	<b>Filename/Deposition Exhibit</b>	<b>Description</b>	<b>Defendants' Objections</b>
PX716	ATC Bills Oct 2022	ATC Attorneys' Fees and Expenses Through October 2022 <sup>1</sup>		Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403; Foundation; Authentication; Not a jury issue
PX717	BME Bills Oct 2022	BME Attorneys' Fees and Expenses Through October 2022		Relevance under Rule 401 and unfair prejudice and confusion of the issues under Rule 403; Foundation; Authentication; Not a jury issue

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<sup>1</sup> For PX716 and PX717, Plaintiffs reserve the right to introduce, at the appropriate time, updated fees and expenses documents to reflect fees and expenses incurred since the date these exhibits were generated.

**ATTACHMENT “G-2”  
DEFENDANTS’ PROPOSED EXHIBIT LIST WITH PLAINTIFFS’  
OBJECTIONS**

Defendants Red Roof Inns, Inc., FMW RRI NC, LLC, Red Roof Franchising, LLC, RRI West Management, LLC, and RRI III, LLC (collectively “Defendants”), pursuant to agreement with Plaintiffs, provide their preliminary exhibit list to Plaintiffs only. As agreed between the parties, Defendants reserve the right to supplement this exhibit list up to and including in the Preliminary Pretrial Order and as otherwise permitted under this Court’s Standing Order for Civil Cases and the Federal Rules of Civil Procedure.

Defendants further object to the use of exhibits and trial testimony of plaintiffs other than Jane Does 1-4. Defendants agree to meet and confer with Plaintiffs on this point and resolve before September 11.

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
1.	None	Plaintiff Jane Doe 1’s Objections and Responses to Defendant HIS Chamblee, LLC’s First Set of Continuing Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
2.	None	Plaintiff Jane Doe 1’s Objections and Responses to Defendants Hilton Worldwide Holdings, Inc.’s, Hilton Domestic Operating Company Inc.’s and Hilton Franchise Holding LLC’s First Set of Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
3.	None	Plaintiff Jane Doe 1's Supplemental and Amended Objections and Responses to Defendant Kuzzins Buford's First Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
4.	None	Plaintiff Jane Doe 1's Objections and Responses to Defendant WHG SU Atlanta, LLC's First Set of Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
5.	None	Plaintiff Jane Doe 1's Objections and Responses to Defendant Red Roof Inns, Inc.'s Requests for Admission	Relevance, Confusion, Prejudice, 404(b), 412
6.	None	Plaintiff Jane Doe 1's Objections and Responses to Defendant Microtel Inns and Suites Franchising, Inc.'s First Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
7.	JD10000023-0000312	Dekalb County Jail records	Authenticity; Hearsay; Relevance, Prejudice
8.	JD10000005-0000022	Probation Department records	Authenticity; Hearsay; Relevance; 404(b), Prejudice
9.	JD10000865-0000944	State of Georgia, Gwinnett Superior Court criminal records	Authenticity; Hearsay; Relevance; 404(b), Prejudice
10.	JD1 4-6	State of Georgia v. K.K. criminal court records	Authenticity; Hearsay; Relevance; 404(b), Prejudice
11.	JD10000800-0000849; JD1 Deposition Exhibit 7	Fulton County Superior Court criminal records	Authenticity; Hearsay; Relevance; 404(b), Prejudice
12.	JD10000648-651	Dekalb County Superior Court criminal records	Authenticity; Hearsay; Relevance; 404(b), Prejudice

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
13.	JD10001266-0001277	Sandy Springs Police Department Incident Report and records	Authenticity; Hearsay; Relevance; 404(b), Prejudice
14.	JD10000001-0000004; 697-706	Duluth Municipal Court criminal records	Authenticity; Hearsay; Relevance; 404(b), Prejudice
15.	JD1 Deposition Exhibit 21	Newport Police Department Incident Report and records	Authenticity; Hearsay; Relevance; 404(b), Prejudice
16.	JD1 Deposition Exhibit 11	Atlanta Police Department Incident Report and records	Authenticity; Hearsay; Relevance; 404(b), Prejudice
17.	JD10000356-0000370	Alpharetta Police Department Incident Report and records	Authenticity; Hearsay; Relevance; 404(b), Prejudice
18.	JD10000371-0000391	Brookhaven Police Department Incident Report and records	Authenticity; Hearsay; Relevance; 404(b), Prejudice
19.	JD10000945-983 Pltf-SUB-JD1-000772-933	Helen Ross McNabb Medical Center medical records	Authenticity; Hearsay; Relevance, Prejudice
20.	JD10000629-0000696	Dekalb County arrest and criminal records	Authenticity; Hearsay; Relevance, Prejudice
21.	JD10001205-0001232	Rosewell Police Department warrant and report	Authenticity; Hearsay; Relevance, Prejudice
22.	JD10000318-0000354	Gwinnett County Sherriff and Police Department records	Authenticity; Hearsay; Relevance, Prejudice
23.	JD10000315-0000317; 855-864	Bioreference Laboratories records	Authenticity; Hearsay; Relevance, Prejudice
24.	JD10000392-0000394; JD10001278-0001322	Cartersville Medical Center records	Authenticity; Hearsay; Relevance, Prejudice

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
25.	JD10000401-475; 525-628	Crossroads Treatment Center medical records	Authenticity; Hearsay; Relevance, Prejudice
26.	JD10000707-799	Emory Crawford Long Hospital records	Authenticity; Hearsay; Relevance, Prejudice
27.		Centerville Medical Center records	Authenticity; Hearsay; Relevance, Prejudice
28.	JD10000984; 986	Various Photos of Jane Doe 1, produced in discovery	Authenticity; Relevance, Prejudice
29.	JD10001191	Jane Doe 1 Resume	Relevance
30.	JD10001189-0001203	Phoenix Direct Employment records	Relevance, Prejudice
31.	RRI 013364 - 013366	Affidavit of Meghan Harrsch	Authenticity; Hearsay
32.	JD10002224-0002237	St. Jude's Recovery Center medical records	Authenticity; Hearsay; Relevance; Prejudice
33.	JD10000476-0000524	Georgia Treatment Center medical records	Authenticity; Hearsay; Relevance; Prejudice
34.	JD10001160-0001188; 1204	Rescuing Hope records	Authenticity; Hearsay
35.	JD10001323-0001372	Atlanta Medical Center medical records	Authenticity; Hearsay; Relevance; Prejudice
36.	JD10001373-0002003	Wellstar Kennestone records	Authenticity; Hearsay; Relevance; Prejudice
37.	JD10001233-0001265	Police Event Reports	Authenticity; Hearsay; Relevance; 404(b); Prejudice
38.	JD10000987-0001060	Johns Creek Police Department Incident Reports and records	Authenticity; Hearsay; Relevance; 404(b); Prejudice
39.	JD10001061-0001159	Lexington County Sheriff's Department Incident Reports and records	Authenticity; Hearsay; Relevance; 404(b); Prejudice
40.	JD10000850-0000854	Gwinnett County Police Department Incident Report and records	Authenticity; Hearsay; Relevance; 404(b); Prejudice

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
41.	JD10000697-0000706	Duluth Municipal Court and Duluth Police records	Authenticity; Hearsay; Relevance; 404(b); Prejudice
42.	None	Plaintiff Jane Doe 2's Objections and Responses to Defendants Hilton Worldwide Holdings, Inc.'s, Hilton Domestic Operating Company Inc.'s, and Hilton Franchise Holding LLC's First Set of Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
43.	None	Plaintiff Jane Doe 2's Objections and Responses to Defendant WHG SU Atlanta, LLC's First Set of Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
44.	None	Plaintiff Jane Doe 2's Objections and Responses to Defendant Red Roof Inns, Inc.'s Requests for Admission	Relevance, Confusion, Prejudice, 404(b), 412
45.	None	Plaintiff Jane Doe 2's Amended and Supplemental Objections and Responses to Defendant Kuzzins Buford, LLC's First Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
46.	None	Plaintiff Jane Doe 2's Objections and Responses to Defendant Microtel Inns and Suites Franchising, Inc.'s First Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
47.	None	Plaintiff Jane Doe 2's Objections and Responses to Defendant Varahi Hotel, LLC's Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
48.		Roseville High School academic records	Authenticity; Hearsay; Relevance



<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
49.	Pltf-Sub-JD2-000010-29	Merced Union High School academic records	Authenticity; Hearsay; Relevance
50.		May 20, 2020 Gilgal Letter	Authenticity; Hearsay; Relevance
51.	RRI 013365 – 013368	Text messages sent and received by Jane Doe 2	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
52.	JD2 0000960 - 1216	Various prostitution advertisements	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
53.		Johns Creek Police Department Incident Reports and records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
54.		Various Johns Creek Police Department body camera footage	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
55.	JD20000781-0000799	Cobb County Police Department Incident Report and records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
56.		Martin County Superior Court records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
57.		Los Angeles Superior Court records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
58.		Marion County Superior Court records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
59.	JD20004087-0004096	Bend Treatment Center medical records	Authenticity; Hearsay; Relevance; Prejudice
60.	JD20000800-0000810	Cobb County criminal court records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
61.	JD20000811-0000846	C.O.R.E. Medical Clinic, Inc. records	Authenticity; Hearsay; Relevance; Prejudice

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
62.	JD20000847-0000899	Crossroads Treatment Center Medical Records	Authenticity; Hearsay; Relevance; Prejudice
63.	JD20001888-0002391	Peachford Behavioral Health records	Authenticity; Hearsay; Relevance; Prejudice
64.	JD20002392-0002429	Planned Parenthood records	Authenticity; Hearsay; Relevance; Prejudice
65.	JD20002430-0002449	Rescuing Hope records	Authenticity; Hearsay; Prejudice
66.	JD20002450-0002475	Ridgeview records	Authenticity; Hearsay; Relevance; Prejudice
67.	JD20002476-0002500; Pltf-SUB-JD2-000030-000065	Rightside up records	Authenticity; Hearsay; Relevance; Prejudice
68.	JD20001638-0001684	Lakeview Behavioral Health records	Authenticity; Hearsay; Relevance; Prejudice
69.	JD20001698-0001744	ML Health records	Authenticity; Hearsay; Relevance; Prejudice
70.	JD20001745-0001877	Northside Hospital Duluth records	Authenticity; Hearsay; Relevance; Prejudice
71.	JD20000900-0000959	Highland River Medical Records	Authenticity; Hearsay; Relevance; Prejudice
72.	JD20001217-1627	Photographs of Jane Doe 2 produced in discovery	Authenticity; Hearsay; Prejudice
73.	JD20000960-0001160	Emails to and from Jane Doe 2 produced in discovery	Authenticity; Hearsay; Relevance; Prejudice
74.	RRI 013365 – 013368	Various text messages	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
75.	RRI 013369- RRI 013377	Various journal notes	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
76.	RRI 013378	Price list	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
77.	RRI 013379 - 013389	Various journal entries	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
78.	JD20000031-0000065	Metro Atlanta Recovery medical records	Authenticity; Hearsay; Relevance; Prejudice
79.	None	Plaintiff Jane Doe 3's Objections and Responses to Defendants Hilton Worldwide Holdings, Inc.'s, Hilton Domestic Operating Company Inc.'s, and Hilton Franchise Holding LLC's First Set of Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
80.	None	Plaintiff Jane Doe 3's Objections and Responses to Defendant WHG SU Atlanta, LLC's First Set of Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
81.	None	Plaintiff Jane Doe 3's Supplemental Objections and Responses to Defendant Kuzzins Buford, LLC's First Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
82.	None	Plaintiff Jane Doe 3's Objections and Responses to Defendant Microtel Inns and Suites Franchising, Inc.'s First Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
83.	None	Plaintiff Jane Doe 3's Objections and Responses to Defendant Red Roof Inns, Inc.'s Request for Admission	Relevance, Confusion, Prejudice, 404(b), 412
84.	JD30000292	Chiropractic Health Clinic Correspondence	Authenticity; Hearsay; Relevance; Prejudice
85.	JD30000001-0000005	Dekalb Police Department Incident Reports and records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
86.	JD3000025-0000028; 56	State of GA v. S.M. criminal court records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
87.	JD3 Deposition Exhibits 5, 13	Sandy Springs Police Department Incident Report	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
88.	JD3 Deposition Exhibit 6	Alpharetta Police Department Incident Reports and records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
89.	JD3 Deposition Exhibits 7 and 11	Roswell Police Department Incident Reports and records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
90.	JD3 Deposition Exhibit 8	Atlanta Police Department Incident Reports and records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
91.	JD3 Deposition Exhibit 9	Bossier Parish Sheriff Booking Report and records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
92.	JD3 Deposition Exhibit 10	Gwinnett County Police Department Incident Report and records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
93.	JD30000010-0000024; 29-45	Gwinnett County Superior Court records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
94.	JD3 Deposition Exhibit 12	Dekalb County Police Department Incident Reports and records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
95.	JD30000310, 0000385-389	Dunwoody Police Department Incident Reports and records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
96.	JD3 Deposition Exhibit 15	Lawrenceville Police Department Incident Reports and records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
97.	JD30000072-0000075	Louisiana State University Health Sciences Center medical records	Authenticity; Hearsay; Relevance; Prejudice

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
98.	JD30000318-0000328	Emerald Isle Counseling medical records	Authenticity; Hearsay; Relevance; Prejudice
99.	JD30000291	Centered for Life Counseling Records	Authenticity; Hearsay; Relevance; Prejudice
100.	JD30000177, 179, 198, 201-203, 205-208, 210-213, 215-219, 222-225, 227-230, 234-237, 243-246, 248-251, 255-258; 431, 198-258, 431	Various photographs of Jane Doe 3	Authenticity; Hearsay; Relevance; Prejudice
101.	JD30000170-176, 183-190, 196-197, 198-258	Various emails relating to solicitation and advertising	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
102.	JD3 Deposition Exhibit 19	Excerpts of Jane Doe 3's social media accounts	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
103.	None	Fulton County Centennial High School records	Authenticity; Hearsay; Relevance; Prejudice
104.	None	Fulton County Holcomb Bridge Middle School records	Authenticity; Hearsay; Relevance; Prejudice
105.	JD30000078-0000169; Pltf-SUB-JD3000818-000896	Wellstar Douglas Hospital medical records	Authenticity; Hearsay; Relevance; Prejudice
106.	Pltf-SUB-JD3000813-000817	Deuser & Associates medical records	Authenticity; Hearsay; Relevance; Prejudice

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
107.	JD30000049-0000053; 56-62	DeKalb State Court records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
108.	JD30000054-0000055; 0000293-0000300	Baton Rouge Police Records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
109.	JD300000046-0000047	Cobb County Police Records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
110.	JD30000345-0000348	Gwinnett County Sherriff records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
111.	None	Plaintiff Jane Doe 4's Objections and Responses to Defendants Hilton Worldwide Holdings, Inc.'s, Hilton Domestic Operating Company Inc.'s, and Hilton Franchise Holding LLC's First Set of Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
112.	None	Plaintiff Jane Doe 4's Objections and Responses to Defendant Red Roof Inns, Inc's Requests for Admission	Relevance, Confusion, Prejudice, 404(b), 412
113.	None	Plaintiff Jane Doe 4's Objections and Responses to Defendant WHG SU Atlanta, LLC's First Set of Interrogatories	Relevance, Confusion, Prejudice, 404(b), 412
114.	Pltf-SUB-JD4-000001-000085	Emory St. Joseph's Hospital medical records	Authenticity; Hearsay; Relevance; Prejudice
115.	JD4 Deposition Exhibit 8	Georgia Uniform Motor Vehicle Accident Reports	Authenticity; Hearsay; Relevance; Prejudice
116.	JD40001505	LabCorp medical records	Authenticity; Hearsay; Relevance; Prejudice

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
117.	JD40001942-1945; 1973-1975; 1983-1985	Bank of America bank records	Authenticity; Hearsay; Relevance; Prejudice
118.	JD40001702-0001725; 2077-2078	Eastman Credit Union records	Authenticity; Hearsay; Relevance; Prejudice
119.	JD4 Deposition Exhibit 11	Sandy Springs Police Department Incident Reports and records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
120.	JD4 Deposition Exhibits 18 and 25	Cobb County Police Department Incident Reports and records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
121.	JD4 Deposition Exhibit 24	Rosewell Police Department Incident Reports and records	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
122.	JD40002235	Mercy Multiplied medical records	Authenticity; Hearsay; Relevance; Prejudice
123.	JD40000364-0000622; 2340-2384	Shepard Center Dictation Report	Authenticity; Hearsay; Relevance; Prejudice
124.	JD4 Deposition Exhibits 15, 17, 19, and 20	Peachford Behavioral Health Systems of Atlanta medical records	Authenticity; Hearsay; Relevance; Prejudice
125.	JD40001233	Wellspring Living medical records	Authenticity; Hearsay; Relevance; Prejudice
126.	JD40002236-0002242	Midtown Urology records	Authenticity; Hearsay; Relevance; Prejudice
127.	JD40001235	Breakthrough Recovery Outreach, LLC records	Authenticity; Hearsay; Relevance; Prejudice
128.	JD40000641-0000644	Johnson City Medical Center records	Authenticity; Hearsay; Relevance; Prejudice
129.	JD40000645	Appalachian Emergency Physicians records	Authenticity; Hearsay; Relevance; Prejudice



<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
130.	JD40000646	Indian Path Medical Center records	Authenticity; Hearsay; Relevance; Prejudice
131.	JD40002235	Mercy Ministry records	Authenticity; Hearsay; Relevance; Prejudice
132.	JD40002428-0002472	Wellstar Kennestone records	Authenticity; Hearsay; Relevance; Prejudice
133.	JD4 Deposition Exhibit 29	Various social media and Facebook posts by Jane Doe 4.	Authenticity; Hearsay; Relevance; 404(b); 412; Prejudice
134.	JD4 Deposition Exhibit 6	Publix payroll records	
135.	Pltf-SUB-JD4-000086-000561	Holston Medical Group	Authenticity; Hearsay; Relevance; Prejudice
136.	JD400002487	Facebook	Authenticity; Hearsay; Relevance; Prejudice
137.	RRI 000677 - 000721	Franchise Agreement by and between Red Roof Franchising, LLC and DMARC 2007-CD5 Druid Hills, LP	
138.	RRI 000722 – 000758	Exclusive Property Management Agreement for Atlanta Druid Hills	
139.	RRI 000991 - 001102	Property Management Agreement by and between FMW RRI NC LLC and RRI West Management, LLC	
140.	RRI 000766 - 000771	Limited Warranty Deed between RRI III LLC and DMARC 2007-CD5 Druid Hills Limited Partnership	
141.	RRI 000263 - 000305	Red Roof InnSider Employee Handbook	
142.	RRI_WK_00 011505 – 00011527	Housekeeping Handbook,	



<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
143.	HB_NDGA_Red_Roof_0000140 - 193	Red Roof Standards Manual,	
144.	HB_NDGA_Red_Roof_0000402 - 00000424	Safety and Security Presentation	
145.	RRI_WK_000028347-000028365	Safety and Security Presentation	
146.	HB_NDGA_Red_Roof_00000708 - 00001504	Manager in Training Manual	
147.	RRI_WK_00011168 – 00011306	Operations Manual, Safety and Security December 2010	
148.	RRI_WK_00011789 - 00011817	Red Roof Inn General Manager Safety and Security Presentation	
149.	RRI 000809 - 000821	Security Services Agreement between B.E.S.T., Inc. and Red Roof Inn #10130	
150.	RRI 001594 – 001605	Security Services Agreement between Best Security and Red Roof Inns, Inc.	
151.		Security Services Agreement between Allegiance Security Group and Red Roof Inns, Inc.	
152.	RRI 001423 – 001476	Franchise Agreement by and between Red Roof Franchising, LLC and Varahi Hotel, LLC	
153.	RRI 000941 – 000984	Franchise Agreement by and between Red Roof Franchising, LLC and FMW RRI NC LLC	

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
154.	RRI 000137 – 000177	GSR Inn Sider	
155.	RRI 000178 – 000222	GSR Inn Sider	
156.	RRI000223 - 000262	Inn Management Insider	
157.	RRI_WK_00 001879 - 00001888	Security Guard Protection Agreement	
158.	RRI 000466 – 000497	Preventing & Reacting to Child Sex Trafficking	
159.	RRI_WK_00 001150 - 00001181	Preventing & Reacting to Child Sex Trafficking	
160.	RRI_WK_00 012179 - 00012200	Preventing & Reacting to Child Sex Trafficking Quiz,	
161.	RRI 000923 - 000940	Red Roof Inn Weekly e-Pak	
162.	RRI 005311 - 005312	January 22, 2016 Letter	Authenticity; Hearsay
163.	RRI_WK_00 005596 – 00005598	Email correspondence	Authenticity; Hearsay
164.	RRI_WK_00 068385 – 00068389	Email correspondence	
165.	RRI_WK_00 004246 – RRI_WK_00 004247	Email correspondence	

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
166.	RRI_WK_00 005613 – 00005614	Email correspondence	
167.	RRI_WK_00 003033- 3036	Email correspondence	
168.	RRI_WK_00 000419 – 00000421	Email correspondence	
169.	RRI_WK_00 004225	Email correspondence	
170.	RRI_WK_00 001248- 00001249	Smyrna Action Plan	
171.	RRI_WK_00 004312 – 00004315	Email correspondence	
172.	RRI_WK_00 000548 – 00000609	Smyrna Do Not Rent List	
173.	RRI_WK_00 005483 – 00005484	Email correspondence	
174.	RRI_WK_00 004222	Email correspondence	
175.	RRI_WK_00 000142 – 00000153	Smyrna Franchise Visit	

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
176.	RRI_WK_00 005267 – 00005268	Email correspondence	
177.	RRI_WK_00 045335 – 00045336	Email correspondence	
178.	RRI_WK_00 003033 – 3036	Smyrna safety and security	
179.	RRI_WK_00 069567 – 00069568	Incident Report	
180.	RRI_WK_00 048240 – 00048241	Incident Report	
181.	RRI_WK_00 048266 – 00048267	Incident Report	
182.	RRI_WK_00 000821 – 00000824	Email correspondence	
183.	RRI_WK_00 000825 – 00000828	Email correspondence	
184.	RRI_WK_00 005037 – 00005042	Email correspondence	

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
185.	RRI_WK_00 004761 – 00004762	Email correspondence	
186.	RRI_WK_00 004735 – 00004736	Email correspondence	
187.	RRI_WK_00 033880 – 00033881	Email correspondence	
188.	RRI_WK_00 000670 – 00000677	Internal Audit Report	
189.	RRI_WK_00 061262 – 00061264	Email correspondence	
190.	RRI_WK_00 012547 – 00012549	Email correspondence	
191.		AAPL Task Force, “Video Recording of Forensic Psychiatric American Academy of Psychiatry and the Law, Revised May 2013 Evaluations.”	Inadmissible learned treatise; Hearsay; Relevance
192.		Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition, (DSM-5-TR), American Psychiatric Association, March 2022 Text Revision	Inadmissible learned treatise; Hearsay; Relevance
193.		American Psychiatric Association, “CPT Primer for Psychiatrists,”	Inadmissible learned treatise; Hearsay; Relevance

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
194.		Centers for Medicare and Medicaid Services, “Medicare Physician (MPFS),” Fee Schedule	Authenticitiy; Hearsay; Relevance
195.		Centers for Medicare and Medicaid Services, “Billing and Coding: Psychiatric Diagnostic Evaluation and Psychotherapy Service,”	Authenticity; Hearsay; Relevance
196.		Hidden in Plain Sight: America’s Slaves of the New Millennium	Inadmissible learned treatise; Hearsay;
197.		Reid, Joan A. "Entrapment and enmeshment schemes used by sex traffickers." Sexual Abuse 28.6 (2016): 491-511	Inadmissible learned treatise; Hearsay;
198.		United Nations Office on Drugs and Crime (2008). An Introduction to Human Trafficking: Vulnerability, Impact and Action	Inadmissible learned treatise; Hearsay;
199.		Department of Justice, Federal Bureau of Investigation. N.d. Human Trafficking in the Uniform Crime Reporting (UCR) Program	
200.		Song, Sandra. 2019. When Anti-Sex Trafficking Policies Like the Marriott's Do More Harm Than Good. Paper Magazine	Hearsay
201.		Operational indicators of trafficking in human beings	

Exhibit Number	Bates Range	Description	Objection
202.		Farley M, Barkan H. Prostitution, violence, and posttraumatic stress disorder. Women Health. 1998;27(3):37-49. doi: 10.1300/J013v27n03_03. PMID: 9698636	
203.		Farley, Melissa. (2003). Prostitution and Trafficking in 9 Countries: Update on Violence and Posttraumatic Stress Disorder. Journal of Trauma Practice. 2. 33-74	
204.		Park JN, Decker MR, Bass JK, Galai N, Tomko C, Jain KM, Footer KHA, Sherman SG. Cumulative Violence and PTSD Symptom Severity Among Urban Street- Based Female Sex Workers. J Interpers Violence. 2021 Nov;36(21-22):10383- 10404. doi: 10.1177/0886260519884694. Epub 2019 Nov 2. PMID: 31679445; PMCID: PMC7195245.	
205.		Hopper, E. K., and L. D. Gonzalez. "A comparison of psychological symptoms in survivors of sex and labor trafficking." Behavioral medicine 44.3 (2018): 177-188	
206.		Trafficking to the Rescue?, 54 U.C. Davis Law Review 1 (2020)	

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
207.		Cook, Rhonda, "Human Trafficking Documented in Georgia." The Atlanta Journal Constitution, May 2, 2014, accessed October 1, 2022	
208.		FBI CJIS Report: 2014 Crime in the United States	
209.		Public Law 115-393 – December 21, 2018, Section 2 (Findings)(2)(6)	
210.		DHS Blue Campaign: Hospitality Toolkit. U.S. Department of Homeland Security. <a href="https://www.dhs.gov/sites/default/files/publications/blue-campaign/toolkits/hospitality-toolkit-eng.pdf">https://www.dhs.gov/sites/default/files/publications/blue-campaign/toolkits/hospitality-toolkit-eng.pdf</a> , accessed September 3, 2022	
211.		Exhibit D2 to Deposition of Michael Beene	
212.		Exhibit 1 to Deposition of Michael Beene	Hearsay; Relevance; Prejudice
213.		Exhibit 2 to Deposition of Michael Beene	
214.		Exhibit 3 to Deposition of Michael Beene	
215.		Exhibit 5 to Deposition of Michael Beene	
216.		Exhibit 6 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
217.		Exhibit 7 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
218.		Exhibit 8 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
219.		Exhibit 9 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice



<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
220.		Exhibit 10 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
221.		Exhibit 11 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
222.		Exhibit 12 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
223.		Exhibit 13 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
224.		Exhibit 14 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
225.		Exhibit 15 to Deposition of Michael Beene	
226.		Exhibit 16 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
227.		Exhibit 17 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
228.		Exhibit 18 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
229.		Exhibit 19 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
230.		Exhibit 20 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
231.		Exhibit 21 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
232.		Exhibit 22 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
233.		Exhibit D2 to Deposition of Michael Beene	Authenticity; Hearsay; Relevance; Prejudice
234.		Exhibit D8 to Deposition of Anthony Crumbley	Authenticity; Relevance; Prejudicial; Prejudice
235.		Exhibit D9 to Deposition of Anthony Crumbley	Authenticity; Relevance; Prejudicial; Prejudice
236.		Exhibit D1 to Deposition of Tradelle Lacy	Hearsay; Relevance; Prejudice
237.		Exhibit 1 to Deposition of Tradelle Lacy	Hearsay; Relevance; Prejudice

<b>Exhibit Number</b>	<b>Bates Range</b>	<b>Description</b>	<b>Objection</b>
238.		Exhibit 3 to Deposition of Tradelle Lacy	Authenticity; Hearsay; Prejudice
239.		Exhibit 4 to Deposition of Tradelle Lacy	Authenticity; Hearsay; Relevance; Prejudice
240.		Exhibit 5 to Deposition of Tradelle Lacy	Authenticity; Relevance; Prejudice
241.		Exhibit D8 to Deposition of Tradelle Lacy	Authenticity; Relevance; Prejudicial; Prejudice
242.		Exhibit D9 to Deposition of Tradelle Lacy	Authenticity; Relevance; Prejudicial; Prejudice
243.		Invoices from Anique Whitmore	
244.		Invoices from David Williamson, MD	
245.		Invoices from Melanie Bliss, Ph.D.	
246.		Invoices from Alan Tallis	
247.		IME Video of JD1	Prejudicial, Confusing, Waste of Time, Cumulative, Misleading
248.		IME Video of JD2	Prejudicial, Confusing, Waste of Time, Cumulative, Misleading
249.		IME Video of JD3	Prejudicial, Confusing, Waste of Time, Cumulative, Misleading
250.		IME Video of JD4	Prejudicial, Confusing, Waste of Time, Cumulative, Misleading

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JANE DOES 1-4,	)	CIVIL ACTION FILE
	)	
Plaintiffs,	)	NO. 1:21-CV-04278-WMR
	)	
v.	)	
	)	
RED ROOF INNS, INC., et al.,	)	
	)	
Defendants.	)	

**VERDICT FORM**

**I. Chesney**

1. Are the Red Roof Defendants liable to Chesney for:

	Yes	No
a. Violating the TVPRA	_____	_____
b. Violating RICO	_____	_____
c. Negligence	_____	_____

2. If you answered Yes to any part of Question 1, above, what amount of damages do you award to Chesney?

\$ \_\_\_\_\_

3. To apportion Chesney's damages, assess the percentage of fault of those Defendants you found liable as well as any other person listed below that you also find to be at fault:

Red Roof Defendants	_____ %
Varahi Hotel LLC	_____ %
Pimps that trafficked Chesney at Red Roof Inns	_____ %
Individuals that paid for sex with Chesney at Red Roof Inns	_____ %
Chesney	_____ %

**The numbers must add up to 100%**

4. Did the Red Roof Defendants have an understanding, spoken or unspoken, with any of the individuals or entities below to make money from renting hotel rooms used for prostitution or sex trafficking:

	Yes	No
a. Varahi Hotel LLC	_____	_____
b. Pimps that trafficked Chesney at the Red Roof Inns	_____	_____
c. Individuals that paid for sex with Chesney at Red Roof	_____	_____

5. Did the Red Roof Defendants act in bad faith such that Chesney should recover her expenses of litigation?

Yes \_\_\_\_\_ No \_\_\_\_\_

6. Should punitive damages be imposed against the Red Roof Defendants?

Yes \_\_\_\_\_ No \_\_\_\_\_

## II. Kristin

1. Are the Red Roof Defendants liable to Kristin for:

	Yes	No
a. Violating the TVPRA	_____	_____
b. Violating RICO	_____	_____
c. Negligence	_____	_____

2. If you answered Yes to any part of Question 1, above, what amount of damages do you award to Kristin?

\$\_\_\_\_\_

3. To apportion Kristin's damages, assess the percentage of fault of those Defendants you found liable as well as any other person listed below that you also find to be at fault:

Red Roof Defendants	_____ %
Varahi Hotel LLC	_____ %
Pimps that trafficked Kristin at Red Roof Inns	_____ %
Individuals that paid for sex with Kristin at Red Roof Inns	_____ %
Kristin	_____ %

**The numbers must add up to 100%**

4. Did the Red Roof Defendants have an understanding, spoken or unspoken, with any of the individuals or entities below to make money from renting hotel rooms used for prostitution or sex trafficking:

	Yes	No
a. Varahi Hotel LLC	_____	_____
b. Pimps that trafficked Kristin at the Red Roof Inns	_____	_____
c. Individuals that paid for sex with Kristin at Red Roof	_____	_____

5. Did the Red Roof Defendants act in bad faith such that Kristin should recover her expenses of litigation?

Yes \_\_\_\_\_ No \_\_\_\_\_

6. Should punitive damages be imposed against the Red Roof Defendants?

Yes \_\_\_\_\_ No \_\_\_\_\_

### III. Micaela

1. Are the Red Roof Defendants liable to Micaela for:

	Yes	No
a. Violating the TVPRA	_____	_____
b. Violating RICO	_____	_____
c. Negligence	_____	_____

2. If you answered Yes to any part of Question 1, above, what amount of damages do you award to Micaela?

\$ \_\_\_\_\_

3. To apportion Micaela's damages, assess the percentage of fault of those Defendants you found liable as well as any other person listed below that you also find to be at fault:

Red Roof Defendants	_____ %
Varahi Hotel LLC	_____ %
Pimps that trafficked Micaela at Red Roof Inns	_____ %
Individuals that paid for sex with Micaela at Red Roof Inns	_____ %
Micaela	_____ %

**The numbers must add up to 100%**

4. Did the Red Roof Defendants have an understanding, spoken or unspoken, with any of the individuals or entities below to make money from renting hotel rooms used for prostitution or sex trafficking:

	Yes	No
a. Varahi Hotel LLC	_____	_____
b. Pimps that trafficked Micaela at the Red Roof Inns	_____	_____
c. Individuals that paid for sex with Micaela at Red Roof	_____	_____

5. Did the Red Roof Defendants act in bad faith such that Micaela should recover her expenses of litigation?

Yes \_\_\_\_\_ No \_\_\_\_\_

6. Should punitive damages be imposed against the Red Roof Defendants?

Yes \_\_\_\_\_ No \_\_\_\_\_

#### IV. Shayna

1. Are the Red Roof Defendants liable to Shayna for:

	Yes	No
a. Violating the TVPRA	_____	_____
b. Violating RICO	_____	_____
c. Negligence	_____	_____

2. If you answered Yes to any part of Question 1, above, what amount of damages do you award to Shayna?

\$\_\_\_\_\_

3. To apportion Shayna's damages, assess the percentage of fault of those Defendants you found liable as well as any other person listed below that you also find to be at fault:

Red Roof Defendants	_____ %
Varahi Hotel LLC	_____ %
Pimps that trafficked Shayna at Red Roof Inns	_____ %
Individuals that paid for sex with Shayna at Red Roof Inns	_____ %
Shayna	_____ %

**The numbers must add up to 100%**



4. Did the Red Roof Defendants have an understanding, spoken or unspoken, with any of the individuals or entities below to make money from renting hotel rooms used for prostitution or sex trafficking:

Yes No

- a. Varahi Hotel LLC \_\_\_\_\_
- b. Pimps that trafficked Shayna at the Red Roof Inns \_\_\_\_\_
- c. Individuals that paid for sex with Shayna at Red Roof \_\_\_\_\_

5. Did the Red Roof Defendants act in bad faith such that Shayna should recover her expenses of litigation?

Yes \_\_\_\_\_ No \_\_\_\_\_

6. Should punitive damages be imposed against the Red Roof Defendants?

Yes \_\_\_\_\_ No \_\_\_\_\_

This is our unanimous verdict, reached on the \_\_\_\_ day of December, 2023

\_\_\_\_\_  
Foreperson

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JANE DOES 1-4,	)	CIVIL ACTION FILE
	)	
Plaintiffs,	)	NO. 1:21-CV-04278-WMR
	)	
v.	)	
	)	
RED ROOF INNS, INC., et al.,	)	
	)	
Defendants.	)	

**VERDICT FORM – PHASE TWO**  
**PUNITIVE DAMAGES, ATTORNEYS’ FEES, & LITIGATION EXPENSES**

**I. Chesney**

1. What amount of punitive damages do you award to Chesney?

\$\_\_\_\_\_

2. Did the Red Roof Defendants act with the specific intent to cause harm?

Yes \_\_\_\_\_ No \_\_\_\_\_

3. What amount of attorney fees do you award to Chesney?

\$\_\_\_\_\_

4. What amount of other expenses of litigation do you award to Chesney?

\$\_\_\_\_\_

**II. Kristin**

1. What amount of punitive damages do you award to Kristin?

\$ \_\_\_\_\_

2. Did the Red Roof Defendants act with the specific intent to cause harm?

Yes \_\_\_\_\_ No \_\_\_\_\_

3. What amount of attorney fees do you award to Kristin?

\$ \_\_\_\_\_

4. What amount of other expenses of litigation do you award to Kristin?

\$ \_\_\_\_\_

**III. Micaela**

1. What amount of punitive damages do you award to Micaela?

\$ \_\_\_\_\_

2. Did the Red Roof Defendants act with the specific intent to cause harm?

Yes \_\_\_\_\_ No \_\_\_\_\_

3. What amount of attorney fees do you award to Micaela?

\$ \_\_\_\_\_

4. What amount of other expenses of litigation do you award to Micaela?

\$ \_\_\_\_\_

**IV. Shayna**

1. What amount of punitive damages do you award to Shayna?

\$ \_\_\_\_\_

2. Did the Red Roof Defendants act with the specific intent to cause harm?

Yes \_\_\_\_\_ No \_\_\_\_\_

3. What amount of attorney fees do you award to Shayna?

\$ \_\_\_\_\_

4. What amount of other expenses of litigation do you award to Shayna?

\$ \_\_\_\_\_

This is our unanimous verdict, reached on the \_\_\_\_ day of December, 2023

\_\_\_\_\_  
Foreperson

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JANE DOES 1-4,	)	CIVIL ACTION FILE
	)	
Plaintiffs,	)	NO. 1:21-CV-04278-WMR
	)	
v.	)	
	)	
RED ROOF INNS, INC., et al.,	)	
	)	
Defendants.	)	

**VERDICT FORM – PHASE THREE**  
**O.C.G.A. § 9-11-68(e)**

1. Did the Red Roof Defendants assert frivolous defenses against Chesney such that she is entitled to damages for those defenses?

Yes \_\_\_\_\_ No \_\_\_\_\_

If you answered Yes, what do you award Chesney for:

Attorneys' fees: \_\_\_\_\_

Other expenses of litigation: \_\_\_\_\_

2. Did the Red Roof Defendants assert frivolous defenses against Kristin such that she is entitled to damages for those defenses?

Yes \_\_\_\_\_ No \_\_\_\_\_

If you answered Yes, what do you award Kristin for:

Attorneys' fees: \_\_\_\_\_

Other expenses of litigation: \_\_\_\_\_

3. Did the Red Roof Defendants assert frivolous defenses against Micaela such that she is entitled to damages for those defenses?

Yes \_\_\_\_\_ No \_\_\_\_\_

If you answered Yes, what do you award Micaela for:

Attorneys' fees: \_\_\_\_\_

Other expenses of litigation: \_\_\_\_\_

4. Did the Red Roof Defendants assert frivolous defenses against Shayna such that she is entitled to damages for those defenses?

Yes \_\_\_\_\_ No \_\_\_\_\_

If you answered Yes, what do you award Shayna for:

Attorneys' fees: \_\_\_\_\_

Other expenses of litigation: \_\_\_\_\_

This is our unanimous verdict, reached on the \_\_\_\_\_ day of December, 2023

\_\_\_\_\_  
Foreperson

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	Alexander, Andrew
<b>DEPOSITION DATE:</b>	6/27/2022

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
9	13	9	15	No objection							
10	21	10	23	No objection							
13	4	14	1	No objection							
15	2	15	17	No objection							
16	23 (begin with "And")	17	1	No objection		17	2	17	17		
18	8	18	15	No objection							
18	21	18	23	No objection							
19	6 (begin with "What")	19	16	No objection							
20	5 (begin with "who")	20	17	No objection							
21	2	21	5	No objection							
21	6	21	9	No objection							
21	10	21	14	No objection							
21	22	22	25	Compound							
23	9	23	12	No objection							
24	12	24	14	No objection							
25	4	25	9	No objection							
25	14	25	18	No objection							
25	20	26	1	No objection							
26	4	26	24	No objection							
27	14	27	18	No objection		27	19	27	25		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<table border="1"> <tr> <td colspan="6"><b>WITNESS NAME:</b></td><td colspan="6">Alexander, Andrew</td></tr> <tr> <td colspan="6"><b>DEPOSITION DATE:</b></td><td colspan="6">6/27/2022</td></tr> </table>												<b>WITNESS NAME:</b>						Alexander, Andrew						<b>DEPOSITION DATE:</b>						6/27/2022					
<b>WITNESS NAME:</b>						Alexander, Andrew																													
<b>DEPOSITION DATE:</b>						6/27/2022																													
<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>																													
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>																								
28	1	28	7	No objection																															
28	12	28	16	No objection																															
29	9 (begin with "do")	29	11	No objection		29	12	30	1																										
31	4	31	7	No objection																															
31	14	31	18	No objection																															
32	3	32	8	No objection																															
32	13	32	14	No objection																															
36	5 (begin with "Were")	36	13	No objection																															
37	20	38	11	No objection																															
40	14 (begin with "you")	40	17	No objection																															
42	1 (begin with "And")	42	11	No objection																															
45	6	45	7	Foundation																															
45	9	45	15	Foundation																															
59	24	60	2	No objection																															
60	10 (begin with "Red")	60	15	Compound, foundation																															



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<table><tr><td colspan="4"><b>WITNESS NAME:</b></td><td colspan="8">Alexander, Andrew</td></tr><tr><td colspan="4"><b>DEPOSITION DATE:</b></td><td colspan="8">6/27/2022</td></tr></table>												<b>WITNESS NAME:</b>				Alexander, Andrew								<b>DEPOSITION DATE:</b>				6/27/2022							
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61	21 (begin with "While")	61	23	No objection																															
62	8	62	11	No objection																															
66	24	67	10	No objection																															
67	15	67	24	No objection																															
69	2	69	5	Foundation		69	7																												
69	8	69	13	No objection																															
70	13	70	20	Foundation, improper lay opinion																															
71	23	72	3	No objection		72	4	72	9																										
82	1	82	4	No objection																															
82	16	82	20	Hearsay, relevance, subsequent remedial measure																															
86	11 (begin with "But")	86	23	Hearsay, relevance, subsequent remedial measure,																															

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

WITNESS NAME: Alexander, Andrew											
DEPOSITION DATE: 6/27/2022											
AFFIRMATIVE DEPOSITION DESIGNATIONS						COUNTER DESIGNATIONS					
Page/Line Begin		Page/Line End		Objections	Replies to Objections	Page/Line Begin		Page/Line End		Objections	Replies to Objections
86	25	87	11	Hearsay, relevance, subsequent remedial measure, improper lay opinion							
91	9 (begin with "you")	91	23	No objection		91	24	92	4		
95	15 (begin with "Did")	95	24	No objection							
98	11 (begin with "And")	98	15	No objection		98	1	98	9		
100	17 (begin with "When")	101	8	Hearsay		101	22	102	6		
102	7	102	16	No objection							
102	19	102	25	No objection							
104	19	104	24	No objection							
105	4	105	11	No objection							
107	19	108	7	No objection							
108	10	108	11	No objection							
108	19	108	25	No objection		109	10	109	18		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b> Alexander, Andrew											
<b>DEPOSITION DATE:</b> 6/27/2022											
<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
110	25	111	25	Hearsay							
114	13	114	22	No objection							
116	3	116	10	No objection							
117	1	117	7	No objection							
121	11 (begin with "I'm")	121	13	Hearsay							
122	2	122	11	Hearsay							
123	20 (begin with "there")	124	3	Hearsay							
124	6	124	10	Foundation							
124	13	124	22	Foundation							
124	25	126	3	Irrelevant, unfairly prejudicial							
125	18	126	17	Irrelevant, unfairly prejudicial							
127	1	127	3	No objection							
127	23	127	24	No objection							
128	15	128	17	Hearsay; attorney- client privileged and work product doctrine							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<table><tr><td colspan="4">WITNESS NAME:</td><td colspan="8">Alexander, Andrew</td></tr><tr><td colspan="4">DEPOSITION DATE:</td><td colspan="8">6/27/2022</td></tr></table>												WITNESS NAME:				Alexander, Andrew								DEPOSITION DATE:				6/27/2022							
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AFFIRMATIVE DEPOSITION DESIGNATIONS												COUNTER DESIGNATIONS																							
Page/Line Begin		Page/Line End		Objections		Replies to Objections		Page/Line Begin		Page/Line End		Objections		Replies to Objections																					
128	20	128	24	Hearsay; attorney-client privileged and work product doctrine																															
129	2	129	6	Hearsay; attorney-client privileged and work product doctrine																															
129	8	129	13	Hearsay; attorney-client privileged and work product doctrine																															
129	24	29	25	No objection																															
130	5 (begin with "I")	130	8	No objection																															
130	16	130	17	No objection																															
130	19	131	12	No objection																															
132	7 (begin with "I")	132	19	No objection																															
135	6	135	15	No objection																															
135	18	135	23	No objection																															
136	6	136	9	Subsequent remedial measure																															

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<table> <tr> <td colspan="6"><b>WITNESS NAME:</b></td><td colspan="6">Alexander, Andrew</td></tr> <tr> <td colspan="6"><b>DEPOSITION DATE:</b></td><td colspan="6">6/27/2022</td></tr> </table>												<b>WITNESS NAME:</b>						Alexander, Andrew						<b>DEPOSITION DATE:</b>						6/27/2022					
<b>WITNESS NAME:</b>						Alexander, Andrew																													
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<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>																								
136	19	137	3	Subsequent remedial measure																															
142	23	143	4	Hearsay; attorney-client privileged																															
171	24	172	5	Hearsay; irrelevant; unfairly prejudicial																															
173	20	174	15	Hearsay; irrelevant; unfairly prejudicial																															
178	24	179	6	Hearsay; irrelevant; unfairly prejudicial																															
179	9	179	20	Hearsay; irrelevant; unfairly prejudicial																															
179	23 (begin with "I")	180	14	Hearsay; irrelevant; unfairly prejudicial																															

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<table><tr><td colspan="4">WITNESS NAME:</td><td colspan="8">Alexander, Andrew</td></tr><tr><td colspan="4">DEPOSITION DATE:</td><td colspan="8">6/27/2022</td></tr></table>												WITNESS NAME:				Alexander, Andrew								DEPOSITION DATE:				6/27/2022							
WITNESS NAME:				Alexander, Andrew																															
DEPOSITION DATE:				6/27/2022																															
AFFIRMATIVE DEPOSITION DESIGNATIONS						COUNTER DESIGNATIONS																													
Page/Line Begin		Page/Line End		Objections	Replies to Objections	Page/Line Begin		Page/Line End		Objections	Replies to Objections																								
183	5 (begin with "I'm")	183	9	Hearsay; irrelevant; unfairly prejudicial																															
186	9	186	11	Hearsay; irrelevant; unfairly prejudicial																															
186	19	186	24	Hearsay; irrelevant; unfairly prejudicial																															
187	2	187	7	Hearsay; irrelevant; unfairly prejudicial																															
187	16	187	23	Hearsay; irrelevant; unfairly prejudicial																															
188	12	188	20	Hearsay; irrelevant; unfairly prejudicial																															



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<table border="1"> <tr> <td colspan="4"><b>WITNESS NAME:</b></td> <td colspan="6">Castille, Forrest</td> </tr> <tr> <td colspan="4"><b>DEPOSITION DATE:</b></td> <td colspan="6">10/22/2021</td> </tr> </table>										<b>WITNESS NAME:</b>				Castille, Forrest						<b>DEPOSITION DATE:</b>				10/22/2021					
<b>WITNESS NAME:</b>				Castille, Forrest																									
<b>DEPOSITION DATE:</b>				10/22/2021																									
				Designations Can Only be Used if Witness is Unavailable to Testify Live																									
<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>										<b>COUNTER DESIGNATIONS</b>																			
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>		<b>Replies to Objections</b>		<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>		<b>Replies to Objections</b>															
15	15	15	17					21	8	21	10																		
16	3	16	5					43	12	43	15																		
17	15 (begin with "did")	21	7					48	7	48	7																		
21	11	24	2	22:3-11 Hearsay, 22:22-23 Speculation; Relevance, 23:1-10 Speculation; Hearsay; Relevance, 23:15-18 Speculation; Relevance, 23:19-23 Speculation; Lack of foundation; relevance				49	1	49	19																		



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

24	6	27	25	24:6-8 Mischaracterizes prior testimony; relevance, 24:9-17 Speculation; Hearsay; Lack of Foundation; relevance, 25:14-15 Speculation; Lack of Foundation; relevance, 25:16-25 Speculation; Relevance, 26:1-9 Hearsay; Relevance, 26:15 Speculation; Relevance, 26:18-19 Speculation, Relevance; More prejudicial than probative, 26:20-25 and 27:1-9 Relevance; more prejudicial than probative, 27:10-13 Speculation; relevance; Lack of Foundation; more prejudicial than probative, 27:14-22 Speculation; Lack of foundation; relevance, 27:23-25 Speculation; relevance; lack of foundation; more prejudicial than probative; assumes facts not in evidence		96	3	96	13		
28	4	37	11	28:4-14 Speculation; Lack of foundation; assumes facts not in evidence; relevance, 29:4-14; 25, and 30:1-7; 11-12; 19-25 Speculation; Relevance; hearsay, 31:1-25 Relevance; More prejudicial than probative, 32:1-3, 33:1-10 Relevance; Speculation, 34:1-25 Relevance; Hearsay; Speculation; more prejudicial than probative, 35:1-25 Speculation; Relevance; more prejudicial than probative, 36:1-4 and 37:2-5 Speculation; Relevance		96	20	96	25		
37	14	39	2	38:1-21 and 39:1-2 Speculation; relevance		97	1	97	11		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

39	7	42	14	39:7-24 and 40:1-6 Speculation; relevance, 41:12-14; 22 Speculation; relevance; more prejudicial than probative		98	21	98	25		
42	16	42	16			99	1	99	1		
42	19	43	11			99	13	99	25		
43	16 (begin with "So")	45	16	44:19-25 Speculation; Lack of foundation		106	9	106	25		
45	18	46	8	45:15-20 Assumes facts not in evidence; speculation; lack of foundation; more prejudicial than probative, 46:7-8 Speculation; lack of foundation		108	3	108	25		
46	11	46	22	46:11-12 Speculation; lack of foundation		109	1	109	13		
47	4	48	6			120	17	120	20		
47	8	48	14			121	5	121	25		
48	16	48	17			124	19	124	25		
49	20	49	23			126	16	126	25		
50	10 (begin with "besides")	50	12			129	1	129	5		
50	17 (begin with "But")	51	9	51:8-9 Speculation; Lack of Foundation		129	7	129	9		
51	12	51	18			129	11	129	13		
51	20	52	9			129	15	129	20		
52	11	52	14			131	14	131	18		
52	18 (begin with "I'm")	53	9			131	20	131	25		
53	12	53	21			132	1	132	2		
54	7	55	20	55:2-15 Speculation; hearsay		132	4	132	18		
56	6	56	24			132	20	132	23		
58	21	58	22			133	7	133	17		
59	2	59	5	Relevance		135	8	135	10		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

59	11	60	20	59:19-25 Speculation; Relevance; Lack of Foundation; Hearsay, 60:1-20 Speculation; Hearsay; Relevance		135	13	135	17		
61	8	61	19	Relevance, Speculation; Assumes facts not in evidence; more prejudicial than probative		135	24	135	25		
63	1	64	24	64:10-13 Relevance; Speculation; Lack of Foundation		136	1	136	2		
65	24	68	5	66:24-25 and 67:1-25 Relevance; Subject to Release		137	8	137	25		
68	8	69	22	68:1-25 Relevance; Subject to Release, 69:1-22 Relevance; Subject to Release; speculation		138	1	138	12		
70	2	70	7	Speculation; subject to release; hearsay		138	19	138	25		
70	11	70	16	Speculation; subject to release; hearsay		139	1	139	1		
70	18	72	15	70:18-25 Speculation; subject to release; hearsay, 71:1-25 Relevance; subject to release; speculation, 72:1-25 Relevance; subject to release; speculation; more prejudicial than probative; improper legal conclusion		139	8	139	25		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

72	18	74	23	72:1-25 Relevance; subject to release; speculation; more prejudicial than probative; improper legal conclusion, 73:1-25 Speculation; Relevance; Subject to Release; more prejudicial than probative; assumes facts not in evidence; lack of foundation, 74:1-25 Speculation; Relevance; Subject to Release; more prejudicial than probative; hearsay		141	20	141	25		
74	25	77	22	75:1-25, 76:1-25 and 77:1-25 Speculation; Relevance; Subject to Release; More prejudicial than probative		142	1	142	11		
78	1	80	4	78:1-25 Assumes facts not in evidence; speculation; relevance; subject to release; more prejudicial than probative, 79:1-25 Speculation; Relevance; Subject to Release; More prejudicial than probative, 80:1-4 Speculation; Relevance; Subject to Release; More prejudicial than probative; hearsay		144	7	144	25		
80	7	80	9			145	7	145	16		
80	12	81	10			145	17	145	25		
81	12	82	16	81:13-18 Speculation as to what she saw, 81:23-25 Relevance, 82:1-2; 15-16 Relevance; Speculation; Lack of Foundation		145	6	145	8		
82	19	83	15	82:19-20 Relevance; Speculation; Lack of Foundation		152	2	152	5		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

83	17	84	4	83:1-25 Relevance; Subject to release, 84:1-25 Relevance; subject to release; speculation		152	7	152	11		
84	7	84	11	84:1-25 Relevance; subject to release; speculation		154	7	154	14		
84	17	85	2	84:1-25 Relevance; subject to release; speculation, 85:1-25 Relevance; subject to release; speculation; hearsay		158	18	158	21		
85	17	86	6	85:1-25 Relevance; subject to release; speculation; hearsay, 85:6-19 Relevance		159	13	159	25		
87	6	88	24	88:22-24 Speculation; Lack of Foundation; Assumes facts not in evidence; relevance		160	1	160	6		
89	3	89	5	89:3-5 Speculation; Lack of Foundation; Hearsay; Assumes facts not in evidence; relevance		161	17	161	25		
89	7	89	21	89:7-9 Speculation; Lack of Foundation; Hearsay; Assumes facts not in evidence; relevance, 89:10-19; 21-25 Hearsay; speculation; relevance		162	1	162	23		
89	23	90	10	89:21-25 Hearsay; speculation; relevance, 90:1-25 Speculation; relevance; more prejudicial than probative		172	20	172	25		
90	12	91	24	90:1-25 Speculation; relevance; more prejudicial than probative, 91:1-25 Speculation; relevance; more prejudicial than probative; subject to release		173	1	173	25		
92	11	92	13			174	1	174	11		
92	15	92	25			175	20	175	25		
93	2	93	5			176	1	176	6		
93	8	93	20	93:17-18 Speculation; lack of foundation		176	25	176	25		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

94	8	94	12			177	1	177	6		
114	18	114	19			179	4	179	12		
119	13	119	15 (end with "deposition")			180	3	180	6		
120	3	120	14			181	6	181	19		
122	1	122	7			182	3	182	25		
122	21	123	21			183	1	183	7		
124	24	125	19	125:7-9; 15-19 Speculation; Hearsay		184	13	184	20 Up to "Yes." Counterde sigante		
126	6	126	15			186	14	186	25		
127	10	128	14	127:18-25 and 128:1 Speculation; Lack of Foundation, 128:13-14 Speculation; Lack of Foundation; Legal Conclusion		187	1	187	7		
127	18	128	14			191	10	191	25		
130	11	131	11	129:9-10 Speculation; Lack of Foundation		192	1	192	11		
141	7	141	19			193	11	193	17		
146	18	147	6			194	14	194	19		
147	10	147	22			204	6	204	21		
148	4	148	13			204	23	204	23		
149	23	150	16			214	15	214	25		
150	19	151	18	151:8-9 Speculation; Lack of foundation		216	22	216	25		
152	18	152	25			217	1	217	20		
153	4	153	13	153:11-13 Speculation; Lack of foundation		224	8	224	25		
155	20	157	9			225	1	225	2		
179	12 (begin with "Who")	179	22	Relevance							
188	2	189	9								
218	8	218	9								
218	15	218	22								
222	18	222	23								
223	3	223	8								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

230	1	231	10							
240	15	240	25	Relevance; Lack of foundation						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<table border="1"> <tr> <td colspan="4"><b>WITNESS NAME:</b></td> <td colspan="4">Cole, Vanessa</td> </tr> <tr> <td colspan="4"><b>DEPOSITION DATE:</b></td> <td colspan="4">10/18/2021</td> </tr> </table>												<b>WITNESS NAME:</b>				Cole, Vanessa				<b>DEPOSITION DATE:</b>				10/18/2021			
<b>WITNESS NAME:</b>				Cole, Vanessa																							
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14	9 (begin with "All")	14	14																								
14	20	14	21																								
15	18 (begin with "Can")	16	7			68	15	69	3																		
17	22 (begin with "Can")	18	11			18	12	19	2																		
19	3 (begin with "So")	19	14			19	15	19	25																		
20	1	20	10																								
20	23	22	14			22	15	22	21																		
23	10	24	18	hearsay;		20	11	20	19																		
24	19 (begin with "what")	26	6	misstates prior testimony; improper attorney testimony;		26	7	26	18																		
26	19	27	14	speculation; foundation; lack of personal knowledge		27	15	27	19																		
27	20	28	13			28	14	28	19																		
28	20	28	22			28	23	29	5																		
29	6	29	16			29	17	29	23																		
						29	9	29	12																		
30	13	31	15			31	16	31	21 (end at week)																		



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

32	15	32	22			32	23	33	13		
34	14 (begin with "And")	38	13	hearsay; speculation; improper attorney testimony/leading; misstates prior testimony;		134	19	136	23		
						139	16	139	22		
						140	3	140	6		
						144	14	144	19		
38	16	39	23								
40	7 (begin with "I")	40	18								
40	20 (begin with "So")	41	19								
42	14	43	3			43	4	43	14		
43	14	44	9	relevance; unduly prejudicial (44:8-9)		44	10	44	15		
44	16 (begin with "you")	45	5								
45	13 (begin with "Did")	46	2								
46	4 (begin with "I")	47	7 (end with "items")	foundation; misstates prior testimony;		47	7	47	10		
47	11	47	23			47	24	48	12		
48	13	48	15			49	7	49	16		
50	1 (begin with "Can")	50	3								
50	5	52	4	hearsay; foundation; speculation; lack of personal knowledge;		139	4	139	15		
55	19 (begin with "Did")	56	8	Relevance;		56	10	56	13		
						56	17	56	25		
						99	25	100	7		
57	1	57	6	Relevance;							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

57	11 (begin with "And")	57	14	Relevance;							
71	18	71	25			71 82 84	14 10 25	71 83 85	17 10 7 (end at yes)		
72	9	72	20			72	21	77	5		
77	6	77	10			77	11	77	16		
85	22	88	7	speculation; foundation; lack of personal knowledge; relevance (87:18-88:7)		88	8	89	17		
89	21	90	19			90	20	91	2		
91	3	91	18			91	19	91	24		
91	25	92	4								
92	9	92	13								
93	1	93	12								
93	21	94	4			94 96	21 2	95 96	5 6		
101	17	101	23 (end with "exactly")			101 101	5 24	101 102	16 11		
103	24	104	2			104	3	104	21		
105	7	105	14			106 106	1 23	106 108	7 9		
108	21	108	25	misstates prior testimony; improper attorney testimony; speculation; lack of personal knowledge		109	1	109	6		
109	7	109	19			109 110	20 21	109 111	15 25		
112	22	114	9	hearsay; lack of personal knowledge; foundation;		114	10	114	16		
115	1	116	9			116	10	117	2		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

119	9	119	20			117	18	119	4		
						119	21	120	4		
						120	8	120	8		
120	9 (begin with "I'm")	120	13								
120	15	120	16			120	18	120	20		
121	7	121	17								
121	19	122	10			122	11	122	18		
122	19	123	10			125	24	126	4		
126	5	126	13			126	14	126	19		
156	5	157	18								
157	20	158	10								
158	14	158	18	misstates prior testimony; leading							
158	22	158	25	misstates prior testimony; leading							
159	2	161	2	speculation; improper lay witness opinion; leading							
161	4	161	4	speculation; improper lay witness opinion; leading							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b> Conner, Brenda										
<b>DEPOSITION DATE:</b> 5/20/2022										
Designations Can Only be Used if Witness is Unavailable to Testify Live										
<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>				
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>	<b>Objections</b>	<b>Replies to Objections</b>
7	13	7	15							
7	18	7	20							
8	21	8	23	Hearsay						
9	3	9	8	Hearsay						
10	22 (begin with "Did")	10	24							
11	3	11	19							
11	21	11	21							
11	23	12	6							
12	13 (begin with "And")	13	2	12:13-25 and 13:1-2 Relevance; Subject to Release						
13	13	13	15							
13	22 (begin with "Have")	14	1	13:22-25 Relevance; Subject to Release, 14:1 Relevance						
14	7 (begin with "And")	14	8	Relevance; Subject to Release						
14	17	15	15	15:9-15 Relevance; Subject to Release						
15	21 (begin with "Tell")	15	23							
15	25	16	17	16:10-17 Relevance; Legal conclusion; Subject to Release						
16	19	16	19	Relevance; Legal conclusion; Subject to Release						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

16	21	17	3	16:21-25 Relevance; Legal conclusion; Subject to Release, 17:1-3 Relevance; Subject to Release							
17	5	17	5	Relevance; Subject to Release		17	21	17	24		
17	8	17	14	Relevance; Subject to Release							
17	25	18	25	17:25 and 18:1-25 Relevance; Subject to Release							
19	2	19	22	Relevance; Speculation							
20	11 (begin with "And")	20	18	Relevance; Subject to Release							
20	19 (begin with "did")	20	21	Speculation; Relevance; Subject to Release							
20	24	20	24	Speculation; Relevance; Subject to Release							
21	1	21	2	Legal conclusion; speculation; relevance; Subject to Release							
21	5	21	5	Legal conclusion; speculation; relevance; Subject to Release							
21	7	21	10	Speculation; Relevance; More prejudicial than probative; Subject to Release							
21	13	21	14	Speculation; Relevance; More prejudicial than probative; Subject to Release							
22	9 (begin with "and")	22	21	Relevance; Speculation; Subject to Release							
23	3	23	4	Relevance; Speculation; Subject to Release							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

23	6	23	7	Relevance; Speculation; Subject to Release							
23	11	23	19	Relevance; Speculation; Subject to Release							
23	21	23	23	Relevance; Speculation; Subject to Release							
24	6	24	18	24:6-16 Relevance; Subject to Release; more prejudicial than probative							
24	20	24	24	24:23-24 Relevance; Subject to Release; more prejudicial than probative							
25	1	25	2	Relevance; Subject to Release		25	12	25	14		
28	9	29	10	28:9-25 Relevance; Subject to Release, 29:1-10 Speculation; Relevance; Hearsay; Subject to Release							
29	12	29	18	Speculation; Relevance; Hearsay; Subject to Release							
29	20 (begin with "seeing")	30	3	29:20-25 Speculation; Relevance; Hearsay; Subject to Release, 30:1-3 Relevance; Hearsay							
34	19	35	21	34:19-25 Relevance; Subject to Release, 35:1-21 Speculation; Relevance							
36	2 (begin with "And")	36	9	Relevance; Subject to Release							
36	10 (begin with "how")	36	16	Relevance; Subject to Release							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

46	16 (begin with "How")	46	21	Speculation; Relevance; Subject to Release							
46	25	47	10	46:25 Speculation; Relevance; Subject to Release, 47:1-10 Relevance; Subject to Release							
47	16	47	21	Relevance; Subject to Release							
48	9	48	17	48:9-25 Relevance; Speculation		48	5	48	8		
48	19	49	3	48:9-25 and 49:1-3 Relevance; Speculation; Subject to Release		49 49	4 21	49 49	12 25		
50	7 (begin with "You")	50	17	Relevance, Subject to Release		50 51	18 2	50 51	25 2		
51	14	52	19	51:14-25 Relevance; Speculation; Subject to Release, 52:1-19 Legal Conclusion; Relevance; Speculation; Hearsay; Subject to Release		52 53	20 1	52 53	25 4		
59	15	59	16	Relevance; Subject to Release							
59	18 (begin with "I")	59	21	Relevance; Subject to Release							
60	2	60	6	Relevance; Subject to Release		70	5	70	12		
60	14 (begin with "Did")	60	20	Speculation; Lack of Foundation		73	2	73	19		
61	22	62	14	61:22-25 and 62:1-14 Relevance; Subject to Release							
63	10	63	16	Relevance; Hearsay; Subject to Release							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

64	2 (begin with "Do")	64	10	Relevance; Subject to Release							
64	11 (begin with "Do")	64	14	Relevance; Subject to Release							
81	4 (begin with "If")	81	23	Relevance; Subject to Release; More prejudicial than probative							
82	14 (begin with "Did")	82	24	Relevance; Subject to Release		88 91	3 2	88 91	5 5		
91	9	91	14	Relevance; Subject to Release		91	15	91	18		
92	22	93	2	92:22-25 and 93:1-2 Relevance; Subject to Release		94 95	1 24	94 95	6 25		
109	24	110	14	109:24-25 and 110:1-14 Relevance; Subject to Release							



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>				Hamilton-Nash, Monica											
<b>DEPOSITION DATE:</b>				1/19/2022											
				Designations Can Only be Used if Witness is Unavailable to Testify Live											
<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>								<b>COUNTER DESIGNATIONS</b>							
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>				
8	6	8	8			24	3	24	24						
10	13	10	14			29	17	30	9						
17	7	18	23			32	9	32	18						
19	14	19	22			42	5	43	8						
25	11	26	22			45	14	46	9						
30	22	31	18			49	4	49	8						
34	17	34	17			50	5	50	19						
34	19 (begin with "So")	35	1			54	21	55	1						
37	5	37	16			57	12	57	17 (end after "ma'am")						
38	7 (begin with "Can")	38	19			65	7	65	14						
39	4	39	7			66	5 begin with	66	8						
47	4	47	5			66	11	66	13						
47	7	47	13			71	20	72	12						
49	9	49	21			72	22	73	2						
52	5	52	12			75	11	75	16						
56	17 (begin with "There"	57	11			75	22	76	16						
62	9	62	25			77	20	78	12						
64	10	65	6			79	19	79	21						
65	14 (begin with "Was")	65	20			80	7	80	15						
65	23 (begin with "was")	66	2			91	23	93	10 (end at "it in that one room")						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

68	22 (begin with "Ms.")	70	18			94	21	94	25		
71	8	71	19			96	5	96	15		
73	3	73	8			117	4	118	13		
79	22	80	1			121	21	122	19		
83	4 (begin with "every")	83	8			128	3	128	4		
83	25	84	6			129	21	130	3		
86	22	86	23			130	5	130	20		
86	25	91	20 (end with "shoes")			137	18	138	7		
95	1	96	4			138	12	139	1		
97	13	98	18	foundation; speculation; hearsay		144	13	144	22		
98	24	99	7 (end at "yes")			149	13	149	15		
99	9	100	7			151	7	151	25		
100	8 (begin with "when")	106	18	106:3-8 speculation; unverified statement		154	12	154	17		
107	7	109	7			161	16	162	4		
111	13	114	4 (end with "here")	113:23-25 hearsay		164	2	164	17		
114	19	115	15			185	15	185	19		
115	23	115	25			186	22	187	6		
116	5	117	3								
119	14	121	20	119:21-24 and 120:25-121:4 hearsay							
137	4	137	17								
138	8	138	11								
139	2	140	21								
140	23 (begin with "You're")	141	13								
142	17	144	9								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

145	15	146	9								
155	23	156	6								
160	2 (begin with "And")	160	12	Relevance							
168	4	168	16								
171	18	172	5								
172	7	172	8								
175	17	176	14								
178	7 (begin with "Through out")	179	11								
179	14	180	9								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	Krawczyk, Kristin (JD1)
<b>DEPOSITION DATE:</b>	6/9/2022

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
6	2	6	12	No objection							
9	4	9	10	No objection							
14	19	14	23	No objection							
33	13	33	20	No objection							
59	1	59	9	No objection							
61	24	62	20	No objection							
133	2	133	4	No objection							
137	17	139	1	No objection							
154	5	154	25	No objection							
158	17	159	23	No objection							
161	15	162	4	No objection							
171	2	171	4	No objection							
184	3	184	8	No objection							
190	22	191	20	No objection							
192	10	192	13	No objection							
193	14	193	17	No objection							
194	5	195	6	No objection							
196	4	196	14	No objection							
202	3	202	22	No objection							
204	13	204	24	No objection							
205	18	207	1	No objection							
207	15	207	21	No objection							
208	6	208	21	No objection							
209	6	210	10	No objection							
213	13	214	19	No objection							
214	25	215	16	No objection							
223	16 (begin with "You said")	224	10	No objection							
229	11	229	12	No objection							
229	14	231	5	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

231	9	231	22	No objection							
	3 (begin with										
233	"how")	233	19	No objection							
	22 (begin with										
237	"How")	238	11	No objection							
250	6	251	15	No objection							
259	21	263	25	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

WITNESS NAME: Krawczyk, Kristin (JD1)

DEPOSITION DATE: 6/10/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS**

Page/Line Begin		Page/Line End		Objections	Replies to Objections
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293	1	293	9	No objection	
297	4	297	14	No objection	
297	19	298	3	No objection	
299	20	299	24	No objection	
312	14	313	2	No objection	
378	7	378	20	No objection	
378	22	378	23	No objection	

**COUNTER DESIGNATIONS**

Page/Line Begin		Page/Line End		Objections	Replies to Objections
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297	15	297	18		
298	4	298	17		
378	25	379	11		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

WITNESS NAME: Lam, Nha Luan "Vickie"

DEPOSITION DATE: 3/11/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS****COUNTER DESIGNATIONS**

<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>	<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>
7	1	7	7			148	10	148	21		
8	18	8	24			148	22	149	2		
12	8	12	12			149	6	149	8		
15	7	17	13			190	10	191	6		
24	22	25	5			191	8	191	14		
28	18	28	24			228	11	228	18		
29	1	30	5								
30	22	31	8								
36	18	37	6								
38	10	38	25								
39	8	40	24								
41	1	41	6								
41	8	41	18								
41	20	43	20								
43	22	44	24								
45	10	45	25								
48	4	48	11								
49	6	50	17								
52	5	52	7								
52	16	53	4								
53	21	54	5								
54	7	56	9								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

56	11	56	21	speculation; foundation; hearsay	Speculation: Objection to speculation waived; Foundation: Ms. Lam testified to receiving the email and to the process for reclassing a review; Hearsay: See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles (customer review not						
56	23	57	20								
57	23	58	6								



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

58	9	59	7	59:6-7, 9-10 speculation; foundation	Speculation: Objection to speculation waived; Foundation: Ms. Lam is describing, based on her experience as VP of franchises, how the reclass process works (namely, that franchise owner (Bob) is not the one who gets to determine if a reclass gets made).						
59	9	60	16								
60	18	60	20								
61	25	62	2								
62	4	62	11								
62	13	62	22								
65	2	66	5								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

73	16	73	23 (end at "0001864 7.")								
74	23	75	18								
75	22	76	8								
76	20	81	9	relevance for non Smyrna and Buckhead properties	See Doc. 348, Plaintiffs' Response to Defendants' MiL to Exclude Evidence of Incidents and Crimes at Properties Other Than Smyrna RRI and Buckhead RRI						
81	15	81	19								
81	21	82	9								
88	22	89	20								
96	10	98	25								
99	2	100	12								
100	14	100	18								
100	20	101	9								
101	12	101	15								
103	7	103	24								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

104	1	107	17								
122	6	124	25								
125	19	125	20								
125	24	127	22								
128	3	128	24								
130	2	130	6								
131	25	132	25								
135	17	136	1	foundation; opinion testimony	Lam was VP overseeing franchise locations, she testified exhibit 7 was "one of the tools used to train managers when they attended manager training," and so she was familiar with and used the training to train her franchises. The question calls for Ms. Lam to testify about the contents						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

136	3	136	3	foundation; opinion testimony	Lam was VP overseeing franchise locations, she testified exhibit 7 was "one of the tools used to train managers when they attended manager training," and so she was familiar with and used the training to train her franchises. The question calls for Ms. Lam to testify about the contents						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

137	2	137	6	foundation; opinion testimony	Lam was VP overseeing franchise locations, she testified exhibit 7 was "one of the tools used to train managers when they attended manager training," and so she was familiar with and used the training to train her franchises. The question calls for Ms. Lam to testify about the contents						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

137	8	138	11	foundation; opinion testimony	Lam was VP overseeing franchise locations, she testified exhibit 7 was "one of the tools used to train managers when they attended manager training," and so she was familiar with and used the training to train her franchises. The question calls for Ms. Lam to testify about the contents						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

138	21	138	25	foundation; opinion testimony	Lam was VP overseeing franchise locations, she testified exhibit 7 was "one of the tools used to train managers when they attended manager training," and so she was familiar with and used the training to train her franchises. The question calls for Ms. Lam to testify about the contents						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

139	4	139	7	foundation; opinion testimony	Lam was VP overseeing franchise locations, she testified exhibit 7 was "one of the tools used to train managers when they attended manager training," and so she was familiar with and used the training to train her franchises. The question calls for Ms. Lam to testify about the contents						
143	14	144	1								
144	7	144	14								
145	15	146	18								
147	8 (begin with "You")	148	9								
149	10	149	20								



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

150	13	152	12								
152	13	153	16								
163	8	167	15	relevance for non Smyrna and Buckhead properties	See Doc. 348, Plaintiffs' Response to Defendants' MIL to Exclude Evidence of Incidents and Crimes at Properties Other Than Smyrna RRI and Buckhead RRI						
167	17	167	23								
167	25	169	8								
169	10	169	21								
170	9	171	5								
171	7	171	15								
171	17	171	24								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

173	2	176	11	relevance for non Smyrna and Buckhead properties	See Doc. 348, Plaintiffs' Response to Defendants' MiL to Exclude Evidence of Incidents and Crimes at Properties Other Than Smyrna RRI and Buckhead RRI						
176	13	176	17								
177	2	177	3								
177	5	177	5								
177	13	178	7								
178	16	179	2								
179	21	180	14								
181	2 (begin with "the")	181	6								
181	8	182	17								
182	19	182	22								
183	8	183	21								
184	18	185	1								
185	7	185	23								
185	25	186	10								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

187	22	188	6								
188	8	188	20								
188	22	189	8								
189	16	189	19								
189	23	190	9								
194	7	195	19	Relevance as to time period	See Doc. 348, Plaintiffs' Response to Defendants' MIL to Exclude Evidence of Incidents and Crimes at Properties Other Than Smyrna RRI and Buckhead RRI						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

195	21	196	5	Relevance as to time period	See Doc. 348, Plaintiffs' Response to Defendants' MiL to Exclude Evidence of Incidents and Crimes at Properties Other Than Smyrna RRI and Buckhead RRI						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

197	1	197	8	Relevance as to time period	See Doc. 348, Plaintiffs' Response to Defendants' MiL to Exclude Evidence of Incidents and Crimes at Properties Other Than Smyrna RRI and Buckhead RRI						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

197	10	199	3	Relevance as to time period	See Doc. 348, Plaintiffs' Response to Defendants' MiL to Exclude Evidence of Incidents and Crimes at Properties Other Than Smyrna RRI and Buckhead RRI						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

199	16	200	12	Relevance as to time period and locations	See Doc. 348, Plaintiffs' Response to Defendants' MiL to Exclude Evidence of Incidents and Crimes at Properties Other Than Smyrna RRI and Buckhead RRI						
202	13	202	20								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

203	18	205	15	Relevance as to time period and locations	See Doc. 348, Plaintiffs' Response to Defendants' MiL to Exclude Evidence of Incidents and Crimes at Properties Other Than Smyrna RRI and Buckhead RRI						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

205	17	207	1	Relevance as to time period and locations	See Doc. 348, Plaintiffs' Response to Defendants' MiL to Exclude Evidence of Incidents and Crimes at Properties Other Than Smyrna RRI and Buckhead RRI						
209	10	209	14								
209	16	210	15								
210	17	210	25								
211	2	211	14								
211	16	212	12								
212	14	212	17								
212	20	213	17								
213	19	214	17								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

222	23	223	16	Relevance as to time period	See Doc. 348, Plaintiffs' Response to Defendants' MiL to Exclude Evidence of Incidents and Crimes at Properties Other Than Smyrna RRI and Buckhead RRI						
224	1	224	4								
224	6	225	25								
226	2	226	5								
226	7	226	15								
226	17	226	24								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

232	12	234	5	Relevance as to time period and other properties	See Doc. 348, Plaintiffs' Response to Defendants' MiL to Exclude Evidence of Incidents and Crimes at Properties Other Than Smyrna RRI and Buckhead RRI						
234	22	234	25								
244	24	245	6								
245	8	245	10								
283	17	285	4								
285	6	285	15								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

WITNESS NAME: Limbert, George

DEPOSITION DATE: 4/27/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS****COUNTER DESIGNATIONS**

<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>	<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>
14	6	14	11	No objection							
16	2	16	4	No objection							
73	23 (begin with "Tell")	74	14	Improper hypothetical, foundation							
74	16	74	17	No objection							
75	11	75	14	Improper hypothetical, foundation							
75	16	75	17	No objection							
75	19	75	21	Improper hypothetical, foundation		85	2	85	10		
76	1	76	2	No objection		86	1	86	12		
96	17 (begin with "didn't")	97	10	Compound, foundation							
97	12	97	13	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

107	18 (begin with "If")	108	4	Improper lay opinion							
108	9	109	4	Improper lay opinion							
111	1	111	6	No objection		114	21	115	7		
143	4	143	14	No objection							
178	23	178	23	No objection							
179	1	179	15	No objection							
179	19	179	22	No objection							
183	1	183	4	No objection		184	6	185	3		
319	11	320	8	Foundation, improper attorney testimony							
320	13	320	15	Foundation, improper lay opinion							
320	17	320	18	Foundation, improper lay opinion							
320	20	320	24	Foundation, improper lay opinion							
321	1	321	12	Foundation, improper lay opinion							
321	16	321	18	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

[illegible]

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

WITNESS NAME: Limbert, George

DEPOSITION DATE: 4/28/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS****COUNTER DESIGNATIONS**

<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>	<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>
6	2	6	12	No Objection							
7	1	7	3	No Objection							
7	10 (begin with "Am")	8	10	No Objection							
8	24	9	5	No Objection							
9	17	10	7	No Objection							
10	24	12	23	No Objection							
14	10 (begin with "Since")	14	18	No Objection							
15	7	15	20	No Objection							
16	3	16	7	No Objection							
16	18	16	25	No Objection							
24	20	25	7	No Objection							
26	19	27	11	Irrelevant							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

30	7	31	7	No Objection							
31	10	31	13	Foundation							
32	2	32	15	Foundation							
32	18	33	4	No Objection							
33	7	33	7	No Objection							
33	17	33	23	No Objection							
34	21	35	4	No Objection	38	38	5	38	13		
42	12	42	23	Hearsay							
42	25 (begin with "were")	43	2	No Objection							
43	8	44	23	Hearsay							
45	5	45	8	Irrelevant							
49	9	50	9	Hearsay							
50	13	50	22	Hearsay							
51	12	51	21	Hearsay							
52	6	52	8	No Objection							
52	11	52	19	No Objection							
53	1	53	10	Hearsay							
55	15	56	20	Hearsay							
57	25	58	3	No Objection							
58	13	58	16	No Objection							
59	7	61	25	No Objection							



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

62	4	62	4	No Objection							
63	8	63	9	No Objection							
64	20	64	21	No Objection							
65	3	65	5	No Objection							
65	8	66	3	No Objection							
66	6	66	7	Foundation		66	8	67	23		
68	24	69	18	Foundation, improper lay opinion							
69	22	70	8	Foundation, improper lay opinion							
70	16	70	21	No Objection							
70	25	72	3	Foundation, improper hypotehtical, improper lay opinion, seeks a legal conclusion							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

72	11	72	22	Foundation, improper hypotehtical, improper lay opinion, seeks a legal conclusion							
73	7	74	7	Foundation, improper hypotehtical, improper lay opinion, seeks a legal conclusion							
74	13	76	3	Foundation, improper hypotehtical, improper lay opinion, seeks a legal conclusion							
77	18	77	24	No Objection							
78	15	78	22	No Objection							
84	16	85	4	No Objection		83	4	83	21		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

87	13	88	10	Foundation, seeks a legal conclusion, improper lay opinion							
88	14	91	25	Foundation, seeks a legal conclusion, improper lay opinion							
92	19	94	1	No Objection							
94	9	94	18	Improper hypotehtical							
104	22	105	23	Attorney- Client Privileged; Work Product Doctrine; hearsay							
106	22	108	25	Attorney- Client Privileged; Work Product Doctrine; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

110	16	110	22	Attorney-Client Privileged; Work Product Doctrine; hearsay							
111	7 (begin with "Atlanta")	111	13	Attorney-Client Privileged;							
114	11	115	2	Attorney-Client Privileged; Work Product Doctrine; hearsay							
115	5	116	5	Attorney-Client Privileged; Work Product Doctrine; hearsay							
116	8	117	9	Attorney-Client Privileged; Work Product Doctrine; hearsay							
117	18	118	3	No Objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

118	5	118	6	Attorney-Client Privileged; Work Product Doctrine							
118	9	118	10	Attorney-Client Privileged; Work Product Doctrine							
118	20	119	5	No Objection							
119	11	119	13	Attorney-Client Privileged; Work Product Doctrine							
119	16	119	17	Attorney-Client Privileged; Work Product Doctrine							
120	22	120	24	Hearsay, Irrelevant, Unfairly Prejudicial							
121	6	121	11	Hearsay, Irrelevant, Unfairly Prejudicial							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

121	13	123	2	Hearsay, Irrelevant, Unfairly Prejudicial							
123	5	123	5	Hearsay, Irrelevant, Unfairly Prejudicial							
123	14	124	14	Attorney- Client Privileged; Work Product Doctrine; hearsay							
124	23 (begin with "Exhibit")	125	13	Hearsay, Irrelevant, Unfairly Prejudicial							
125	21	126	7	Hearsay, Irrelevant, Unfairly Prejudicial; attorney- client privilege; work product doctrine							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

126	10	126	15	Hearsay, Irrelevant, Unfairly Prejudicial; attorney- client privilege; work product doctrine							
127	6	127	10	Hearsay, Irrelevant, Unfairly Prejudicial; attorney- client privilege; work product doctrine							
127	15	127	16	Hearsay, Irrelevant, Unfairly Prejudicial; attorney- client privilege; work product doctrine							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

127	22	128	2	Hearsay, Irrelevant, Unfairly Prejudicial; attorney- client privilege; work product doctrine							
128	16	129	10	Hearsay, Irrelevant, Unfairly Prejudicial; attorney- client privilege; work product doctrine							
130	23	130	24	Hearsay, Irrelevant, Unfairly Prejudicial; attorney- client privilege; work product doctrine							



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

131	2	132	8	Hearsay, Irrelevant, Unfairly Prejudicial; attorney- client privilege; work product doctrine; foundation, improper lay opinion							
132	12	132	14	Foundation, improper lay opinion							
132	20	132	22	Foundation, improper lay opinion, improper hypothetical							
133	1	133	5	Foundation, improper lay opinion, improper hypothetical							
133	10	133	10	Foundation, improper lay opinion, improper hypothetical							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

133	14	134	2	Attorney-Client Privileged; Work Product Doctrine; hearsay							
134	14	134	22	Attorney-Client Privileged; Work Product Doctrine; hearsay							
135	13	136	13	Attorney-Client Privileged; Work Product Doctrine; hearsay							
136	19	137	23	Attorney-Client Privileged; Work Product Doctrine; hearsay							
138	19	138	21	Attorney-Client Privileged; Work Product Doctrine							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

139	20	139	21	Attorney-Client Privileged; Work Product Doctrine							
139	25	142	9	Attorney-Client Privileged; Work Product Doctrine							
143	18	143	19	No Objection							
144	2	146	25	Foundation, irrelevant, unfairly prejudicial, hearsay							
147	10	147	23	No Objection							
148	5	148	8	Hearsay, irrelevant, unfairly prejudicial, foundation							
148	21	149	10	Hearsay, irrelevant, unfairly prejudicial, foundation							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

150	7	150	14	Hearsay, irrelevant, unfairly prejudicial, foundation							
150	17	151	2	Hearsay, irrelevant, unfairly prejudicial, foundation							
151	15	154	25	Hearsay,							
155	4	155	9	Improper attorney testimony, attorney- client privilege, work product doctrine							
156	14	157	2	Attorney- Client Privileged; Work Product Doctrine;							
157	5	158	3	Attorney- Client Privileged; Work Product Doctrine;							
160	21	164	12	No Objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

165	2	165	18	Attorney-Client Privileged; Work Product Doctrine;							
165	25	167	12	Attorney-Client Privileged; Work Product Doctrine;							
167	15	169	13	Foundation, compound, improper hypothetical, Attorney-Client Privilege, work product doctrine							
169	16	171	25	Foundation, compound, improper hypothetical, Attorney-Client Privilege;; Work Product Doctrine;							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

173	1	173	16	Attorney-Client Privileged; Work Product Doctrine							
174	3 (begin with "You're")	174	23	No Objection							
175	2	175	19	Seeks legal conclusion							
176	10	177	10	Improper attorney testimony							
186	14	186	21	Hearsay							
190	6	190	17	Hearsay							
190	21	191	8	Attorney-Client Privileged; Work Product Doctrine							
191	13	191	21	Hearsay							
193	18 (begin with "Do")	194	15	Hearsay							
194	24	196	8	Hearsay							
198	1 (begin with "if")	198	19	Hearsay							
199	12	200	1	Hearsay							
201	14 (begin with "And")	204	6	Hearsay							
204	12	204	25	Hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

205	14 (begin with "All")	206	22	Hearsay							
207	15	208	18	Hearsay							
208	21	209	12	Hearsay							
209	18	209	22	Hearsay							
210	1	211	11	Hearsay							
211	25	213	4	Hearsay							
213	8	214	16	Hearsay							
214	23	215	7	Hearsay							
216	1	216	1	Hearsay							
216	19	217	9	Hearsay							
217	12	218	20	Hearsay							
221	15	223	9	Hearsay							
223	14	224	19	Hearsay							
224	21 (begin with "When")	225	11	No Objection							
225	14	225	24	No Objection							
226	2	226	6	No Objection							
227	5	228	17	Hearsay, Foundation							
228	20	229	1	Foundation							
229	9	229	10	Attorney-Client Privileged; Work Product Doctrine							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

[illegible]



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

WITNESS NAME: Marina MacDonald-

Individual

DEPOSITION DATE: 6/14/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS**

Page/Line Begin		Page/Line End		Objections	Replies to Objections
7	1	7	3		
7	25	8	3		
13	12	14	7		
14	11	14	15		
28	12	29	2		
30	2	30	13		
32	13 (begin with "when")	32	25		
33	3	33	15		
35	8	35	15		
36	11	36	21		
38	18 (begin with "So")	39	1		
54	6	54	11		
55	2	55	4		
55	21	55	22		
56	17	56	17		
56	20	56	25	relevance; speculation	
68	17	68	18		
71	5	71	21	relevance; prejudicial	
72	6	72	15	relevance; prejudicial	

**COUNTER DESIGNATIONS**

Page/Line Begin		Page/Line End		Objections	Replies to Objections
8	4	8	5		
14	16	17	9		
18	16	19	10		
19	20	20	24		
21	5	21	15		
21	20	21	25		
22	1	22	6		
22	23	23	3		
27	11 (start w	28	11		
37	6	37	21		
38	3	38	5		
38	7	38	7		
39	2	39	10		
39	23	39	24		
40	1	40	1		
40	3	40	3		
40	12 (start at	40	20		
41	11	41	15		
41	22 (start at	42	2		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

72	22 (begin with "But")	73	2	relevance; prejudicial		42	9 (start at 42)	42	14		
73	15	74	3	relevance; prejudicial		42	19	42	25		
75	13	75	20			43	5 (start at 43)	43	12		
80	8	80	17			47	3	47	20		
80	19	80	19			51	5	51	22		
80	21	81	1			57	19 (start w	57	23		
81	3	81	21			85	14	85	25		
82	22	83	4			86	9	87	15		
83	6	83	19			106	10	106	14		
83	21	84	7			108	24	109	3		
88	19	88	22			186	3	186	6		
89	3	89	7			186	8	186	13		
90	4	90	25			203	6	203	19		
92	19	92	22			213	11 (start at	213	16		
92	24	93	9			216	5	216	8		
93	11	93	19			220	25 (start at	221	3		
93	22	94	13								
97	11	97	18								
98	4	98	24	relevance; prejudicial							
99	8	99	23	relevance; prejudicial							
100	6 (begin with Let's")	100	19	relevance; prejudicial							
100	21	101	10								
101	15	102	9								
103	5	103	22								
106	19	107	25								
108	17	108	23								
109	12	109	17								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

110	9	110	19								
110	21	110	25								
112	9	112	17								
112	23	112	25								
113	2	114	5								
117	20 (begin with "And")	117	24								
118	19	118	22								
118	24	119	2								
119	9	119	12								
119	25	120	3								
120	12 (begin with "So")	121	19	privileged; hearsay							
121	25	122	8								
123	7	123	24	privileged; hearsay							
127	21	128	19								
132	9	132	18								
132	22	133	7	privileged; hearsay							
133	14 (begin with "So")	133	20	privileged; hearsay							
134	9 (begin with "And")	134	13	privileged; hearsay							
135	13	135	22	privileged; hearsay							
136	3	137	20	privileged; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

138	22 (begin with "So")	138	25								
139	13	139	16								
139	19	139	25								
140	24	141	9								
147	17	147	19								
148	3	148	9								
148	13	149	6 (end with "Reputology")								
150	22	151	5								
151	7	151	14								
152	18	154	4								
154	10	154	14	relevance as to other properties							
155	1	155	12	relevance as to other properties							
156	18	157	8	relevance as to other properties							
157	10	157	10	relevance as to other properties							
157	12	157	21	relevance as to other properties							
158	5	158	10								
158	25	159	1								
160	10	161	4								
161	9	162	1								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

165	4	165	5								
165	10	166	6								
166	8	166	10								
166	15	167	8								
169	5	170	15								
174	16	174	19 (end at "2016")								
175	6	176	9								
176	21	177	24								
178	1	179	24								
180	3	180	7								
180	9	180	17								
181	3	181	4								
181	12	181	18								
182	1	182	6								
182	8	182	15	privileged; hearsay							
182	23	183	12	privileged; hearsay							
185	6	185	13								
189	10	189	14	relevance; prejudicial							
202	16	203	5								
203	20	203	25								
204	5	204	8								
204	10	204	17								
204	19	204	19								
211	9	211	21	foundation; speculation; opinion testimony							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

212	2	212	18	foundation; speculation; opinion testimony							
225	5	225	17	incomplete document; relevance for other properties; prejudicial; hearsay							
226	17	227	4	incomplete document; relevance for other properties; prejudicial; hearsay							
228	4	229	8	incomplete document; relevance for other properties; prejudicial; hearsay							
229	16	229	18	incomplete document; relevance for other properties; prejudicial; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

231	6	231	14	incomplete document; relevance for other properties; prejudicial; hearsay							
232	19	232	24	incomplete document; relevance for other properties; prejudicial; hearsay							
233	1	233	6	incomplete document; relevance for other properties; prejudicial; hearsay							
233	14 (begin with "Had")	233	17	incomplete document; relevance for other properties; prejudicial; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

233	19	234	13	incomplete document; relevance for other properties; prejudicial; hearsay							
234	15	235	1	incomplete document; relevance for other properties; prejudicial; hearsay							
235	6	235	6	incomplete document; relevance for other properties; prejudicial; hearsay							
235	13	235	18	incomplete document; relevance for other properties; prejudicial; hearsay							



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

236	1	236	4	incomplete document; relevance for other properties; prejudicial; hearsay							
236	7	236	10	incomplete document; relevance for other properties; prejudicial; hearsay							
236	12	236	24	incomplete document; relevance for other properties; prejudicial; hearsay							
237	2	237	9	incomplete document; relevance for other properties; prejudicial; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

237	11	237	20	incomplete document; relevance for other properties; prejudicial; hearsay							
237	22	238	1	incomplete document; relevance for other properties; prejudicial; hearsay							
238	3	238	12	incomplete document; relevance for other properties; prejudicial; hearsay							
240	22	240	23	incomplete document; relevance for other properties; prejudicial; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

241	2	241	22	incomplete document; relevance for other properties; prejudicial; hearsay							
241	24	242	20	incomplete document; relevance for other properties; prejudicial; hearsay							
242	22	243	8	incomplete document; relevance for other properties; prejudicial; hearsay							
243	20	244	7	incomplete document; relevance for other properties; prejudicial; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

244	14	245	13	incomplete document; relevance for other properties; prejudicial; hearsay							
245	15	246	3	incomplete document; relevance for other properties; prejudicial; hearsay							
246	5	246	6	incomplete document; relevance for other properties; prejudicial; hearsay							
246	9	246	11	incomplete document; relevance for other properties; prejudicial; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

246	13	246	13	incomplete document; relevance for other properties; prejudicial; hearsay							
246	15	248	4	incomplete document; relevance for other properties; prejudicial; hearsay							
248	6	248	16	incomplete document; relevance for other properties; prejudicial; hearsay							
248	24	249	22	incomplete document; relevance for other properties; prejudicial; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

249	24	250	6	incomplete document; relevance for other properties; prejudicial; hearsay							
250	9	251	14	incomplete document; relevance for other properties; prejudicial; hearsay							
251	16	252	7	incomplete document; relevance for other properties; prejudicial; hearsay							
252	23	253	5	incomplete document; relevance for other properties; prejudicial; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

253	12	253	22	incomplete document; relevance for other properties; prejudicial; hearsay							
253	24	254	12	incomplete document; relevance for other properties; prejudicial; hearsay							
254	14	254	25	incomplete document; relevance for other properties; prejudicial; hearsay							
255	2	255	8	incomplete document; relevance for other properties; prejudicial; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

255	10	255	11	incomplete document; relevance for other properties; prejudicial; hearsay							
255	13	256	3	incomplete document; relevance for other properties; prejudicial; hearsay							
256	5	256	6	incomplete document; relevance for other properties; prejudicial; hearsay							
256	11	258	1	incomplete document; relevance for other properties; prejudicial; hearsay							



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

258	3	258	18	incomplete document; relevance for other properties; prejudicial; hearsay							
259	2	259	23	incomplete document; relevance for other properties; prejudicial; hearsay							
259	25	260	25	incomplete document; relevance for other properties; prejudicial; hearsay							
261	2	261	24	incomplete document; relevance for other properties; prejudicial; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

262	7	262	10	incomplete document; relevance for other properties; prejudicial; hearsay							
262	12	263	6	incomplete document; relevance for other properties; prejudicial; hearsay							
263	8	264	18	incomplete document; relevance for other properties; prejudicial; hearsay							
264	20	264	21	incomplete document; relevance for other properties; prejudicial; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

264	23	265	6	incomplete document; relevance for other properties; prejudicial; hearsay							
265	8	266	1	incomplete document; relevance for other properties; prejudicial; hearsay							
266	3	266	7	incomplete document; relevance for other properties; prejudicial; hearsay							
266	18	267	11	incomplete document; relevance for other properties; prejudicial; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

267	16	268	11	incomplete document; relevance for other properties; prejudicial; hearsay							
268	15	268	23	incomplete document; relevance for other properties; prejudicial; hearsay							
268	25	269	3	incomplete document; relevance for other properties; prejudicial; hearsay							
269	19	271	4	incomplete document; relevance for other properties; prejudicial; hearsay							

[illegible]

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

WITNESS NAME: Marina MacDonald 30(b)(6)

DEPOSITION DATE: 8/24/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS****COUNTER DESIGNATIONS**

Page/Line Begin		Page/Line End		Objections	Replies to Objections	Page/Line Begin		Page/Line End		Objections	Replies to Objections
8	11	8	13			18	14	19	1		
11	5	11	13			20	11	20	19		
12	12	12	14			21	12	21	20		
19	17 (begin with "I")	19	22			72	6	73	25		
19	24	20	10			73	16	73	23		
21	6	21	11			79	3	79	13		
21	21	22	14			79	24 (start at	80	3		
24	25	26	13								
27	21	27	23 (end with "Franchising")								
27	25	28	4								
28	7	28	11								
29	6	29	11								
31	9 (begin with "Red")	31	18								
34	11	34	14								
34	16	35	7								
36	5	37	5								
37	8 (begin with "the")	37	20								
38	2	38	20								
39	5	39	15								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

39	23	40	10								
40	21	41	18								
42	6	42	11								
43	21	44	4								
44	19 (begin with "What")	44	25								
45	3	45	3								
45	9	45	20								
47	7	47	24								
48	5	49	10								
49	12	49	15								
49	19 (begin with "Did")	49	21								
49	23	49	23								
50	1 (begin with "did")	50	16								
50	19	51	5								
51	16	51	21								
53	18 (begin with "Ms.")	54	2	privileged							
54	5	54	6	privileged							
54	9	54	11	privileged							
54	14	54	19	privileged							
55	1	51	17	privileged							
56	10	56	13	privileged							
56	19	56	19	privileged							
58	24	59	12								
59	20	60	10								
61	17	62	2								
63	8	63	13								
63	15	64	13								

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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

[illegible]



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	McElroy, Tom
<b>DEPOSITION DATE:</b>	7/6/2022

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
8	19	8	21								
8	24	9	3								
13	7	16	7	13:7-25, 14:1-25 and 15:1-19 Relevance							
16	11	16	16	16:11-16 Misleading; Assumes facts not in evidence							
16	20	18	20	16:20-22 Misleading; Assumes facts not in evidence							
18	23	22	6								
23	1	23	11								
24	10	24	12								
24	14	24	23								
25	7	25	8	Relevance							
25	10	25	20	Relevance							
25	22	26	4	25:22-25 and 26:1-4 Relevance							
26	20	27	13	26:20-23 Relevance; Speculation							
27	15	27	25								
28	3	28	9								
28	24	29	21	28:24-25 and 29:1-21 Relevance; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

29	23	29	25	29:23-25 Relevance; hearsay							
30	3	30	6	Legal conclusion; speculation; relevance							
30	8	30	8	Legal conclusion; speculation; relevance							
31	20	32	3	31:20-25 Relevance							
32	5	32	11	32:1-11 Relevance							
32	13	33	18	32:12-13 Relevance, 33:1-18 Speculation; Relevance							
33	20	33	20	Speculation; Relevance							
34	8	34	10	Relevance; Speculation							
34	12	35	17	34:12-21 Relevance; Speculation							
34	22	35	17								
36	7	36	9								
36	11	36	18								
37	5	37	17								
37	19	37	25	37:20-25 Relevance; legal conclusion; improper expert opinion							
39	7	39	12	Relevance; legal conclusion; improper expert opinion							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

39	14	40	9	39:14-25 and 40:1-9 Relevance; legal conclusion; improper expert opinion							
39	19	40	9	40:1-9 Relevance; improper expert opinion							
40	11	40	20	40:11 Relevance; improper expert opinion							
40	22	41	7								
44	6	44	12	Relevance; Speculation							
44	14	45	8	44:14-24 Relevance; Speculation							
46	9	46	20								
46	23	47	1	46:23-25 Relevance, 47:1 Relevance; Improper Hypothetical							
47	3	47	17	47:3 and 47:5-17 Relevance; Improper hypothetical; speculation							
47	19	47	25	47:19 Relevance; Improper hypothetical; speculation							
48	13	48	24								
50	11	50	13	Relevance; speculation							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

50	15	50	25	Relevance; speculation							
53	1	53	4	Relevance							
53	6	53	11	53:6 Relevance							
53	13	54	7								
54	11	54	12								
54	14	54	18								
54	20	55	12	55:10-12 Improper opinion							
55	14	55	18	55:14, 16-18 Improper opinion							
55	20	55	23	55:20 Improper opinion							
55	25	56	23	56:2-23 Speculation; Relevance							
57	1	57	4	Relevance; speculation							
57	6	57	23	57:6-16, 17-23 Relevance; speculation							
58	2	58	14	Relevance							
58	16	58	20	58:16, 18-20 Relevance; hearsay							
58	22	60	2	58:22-25, 59:1-25 and 60:1-2 Relevance; hearsay							
61	1	61	8	Relevance; Speculation; Lack of Foundation							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

61	10	61	14	61:10-11 Relevance; Speculation; Lack of Foundation, 61:13-14 Relevance; Lack of Foundation							
61	16	61	19	Relevance; Lack of Foundation							
62	2 (begin with "You")	62	20	Relevance; hearsay							
62	22	63	7	62:22-25 and 63:1-7 Relevance; hearsay							
64	19	64	20	Relevance; hearsay							
64	24	65	1	64:24-25 Relevance; hearsay, 65:1 Relevance; Speculation; Lack of Foundation; Legal conclusion							
65	18	66	4	65:18-25 and 66:1-4 Relevance; Speculation; Lack of Foundation; Legal conclusion							
66	6	66	10	Relevance; Speculation; Lack of Foundation; Legal conclusion; relevance; subject to release							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

66	12	66	16	66:12 Relevance; Speculation; Lack of Foundation; Legal conclusion; relevance; subject to release, 66:14-16 Speculation; Lack of Foundation; Legal conclusion; Improper opinion; relevance; subject to release							
66	18	66	18	66:18 Speculation; Lack of Foundation; Legal conclusion; Improper opinion							
67	20	67	22	Improper opinion; speculation; lack of foundation; legal conclusion; subject to release; relevance							
67	24	68	4	67:24 Improper opinion; speculation; lack of foundation; legal conclusion; subject to release; relevance, 68:1-4 Speculation; legal conclusion; lack of foundation; subject to release; relevance							

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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

[illegible]

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

WITNESS NAME: Moyer, James (Jay)

DEPOSITION DATE: 3/18/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS****COUNTER DESIGNATIONS**

Page/Line Begin		Page/Line End		Objections	Replies to Objections	Page/Line Begin		Page/Line End		Objections	Replies to Objections
9	1	9	11	No objection							
14	12	14	15	No objection							
19	13	20	1	No objection							
22	10	23	1	No objection							
24	21	24	25	Foundation							
26	1	26	25	No objection							
30	3	33	7	No objection		33	10	33	17		
45	15	46	23	No objection							
49	4	50	17	Compound	Form objection waived	50	14	51	5	should end at 51:4 (51:5 begins a new question)	
66	8	66	23	No objection		80	1	80	16		
87	4	87	21	No objection							
95	23	96	8	No objection							
101	12	103	18	No objection							
119	2	119	5	No objection							
119	12	120	5	Foundation	this is about the security K between Buckhead and Best. He says the doc doesnt look familiar						
124	24	125	9	Foundation							
125	13	125	20	Foundation							



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

125	22	126	8	Foundation							
127	7	128	19	No objection							
129	23	130	13	No objection							
130	16	131	1	No objection							
131	3	131	13	No objection							
131	16	133	4	Foundation							
133	6	134	21	Irrelevant	Introducing document from which next few questions are based on						
135	1	137	17	No objection							
137	19	138	2	Compound	not compound, asking if he reached out to safety and security to speak with them on that specific topic						
138	5	138	5	Compound	not compound, asking if he reached out to safety and security to speak with them on that specific topic						
138	8	138	9	No objection							
141	1	141	5	No objection							
141	8	141	16	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

142	24	143	22	Foundation	unclear which question is being objected to. Asked to testify based on position as VP of operations overseeing that locaiton, based on a training included in an email exchange he was on						
143	24	146	4	No objection							
147	2	147	16	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

148	1	148	3	Vague, compound	not compound, asks if he believes property had issues with that group of things, which she aksed about separately before. Question is clear and asks whether he believes that property had issues with those things. Witness was able to answer question with no issues						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

148	6	148	11	Vague, compound	not compound, asks if he believes property had issues with that group of things, which she aksed about separately before. Question is clear and asks whether he believes that property had issues with those things. Witness was able to answer question with no issues						
148	15	150	16	Compound	not compound, asking if he reached out to safety and security to speak with them on that specific topic						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

150	18	151	20	No objection		151	16	153	16		
155	13	155	16	Foundation, vauge	question asks witness to testify from his experience as VP of operations who at some point oversaw that hotel, based on language in exhibit						
155	19	156	10	No objection							
164	5	164	6	No objection		162	5	164	2		
164	21	165	25	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

166	18	169	11	Foundation	unclear which question is being objected to. line of questioning based on Exhibit 108, Moyer familiar with document, testifying to what information his properties, as VP of ops, had access to.						
169	13	170	15	No objection							
170	25	171	1	No objection							
171	23	174	8	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

174	11	176	13	Foundation, improper lay opinion	unclear which question is being objected to. line of questions does not call for expert testimony, asks for his opinion based on his training as VP of ops at RRI; waived form objection						
177	7	178	25	Compound, foundation	waived form of question objection; testified he recalled getting the training, testified as VP of ops over the property who dealt with training	179	1	179	12		
180	6	181	20	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

181	25	182	2	Hearsay, irrelevant, foundation	Doc not being used for the truth of the matter asserted. See Doc. 336, Plaintiffs' response to Defendants' Motion to Exclude Third Party Statements in Police Reports, relevant to whether Defendants adhered to policies and procedures, as VP of ops, he has knowledge and experience to testify to process, policy, and as to what should have						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

183	7	183	23	Hearsay, irrelevant, foundation	Doc not being used for the truth of the matter asserted. See Doc. 336, Plaintiffs' response to Defendants' Motion to Exclude Third Party Statements in Police Reports, relevant to whether Defendants adhered to policies and procedures, as VP of ops, he has knowledge and experience to testify to process, policy, and as to what should have						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

184	1	184	8	Hearsay, irrelevant, foundation	Doc not being used for the truth of the matter asserted. See Doc. 336, Plaintiffs' response to Defendants' Motion to Exclude Third Party Statements in Police Reports, relevant to whether Defendants adhered to policies and procedures, as VP of ops, he has knowledge and experience to testify to process, policy, and as to what should have						
184	10	185	25	Foundation	Moyer, as VP of ops, has personal knoweldge of training, policies, and requirement						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

186	3	187	7	Foundation	Moyer, as VP of ops, has personal knowledge of training, policies, and requirement						
188	21	190	1	Hearsay, irrelevant, foundation	See Doc. 336, Plaintiffs' response to Defendants' Motion to Exclude Third Party Statements in Police Reports, relevant to whether Defendants adhered to policies and procedures, as VP of ops, he has knowledge and experience to testify as to what should have been done in response to these reports						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

190	3	190	17	Foundation, compound	as VP of ops, he has knowledge and experience to testify as to what should have been done in response to these reports; not a compound question, just specifies which guideline she's asking about						
190	19	191	12	Hearsay	See Doc. 336, Plaintiffs' response to Defendants' Motion to Exclude Third Party Statements in Police Reports						
191	14	193	9	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

193	15	194	22	Hearsay, irrelevant, foundation, improper hypothetical	Plaintiffs' response to Defendants' Motion to Exclude Third Party Statements in Police Reports; relevant to whether Red Roof policies and procedures and whether they were followed, Moyer as VP of ops has knowledge and experience to testify on topic; Objection to hypothetical is unclear - no explanation as to why the						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

195	1	195	10	Improper hypothetical	Objection to hypothetical is unclear - no explanation as to why the hypothetical is purportedly improper, in any event, the hypothetical is proper, as it is clear and complete						
195	12	196	2	Improper hypothetical	Objection to hypothetical is unclear - no explanation as to why the hypothetical is purportedly improper, in any event, the hypothetical is proper, as it is clear and complete						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

196	5	197	19	Foundation, improper hypothetical	Objection to hypothetical is unclear - no explanation as to why the hypothetical is purportedly improper, in any event, the hypothetical is proper, as it is clear and complete; Moyer as VP of ops who oversaw that hotel has personal knowledge about layout of hotel and office						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

198	1	199	10	Hearsay, foundation, irrelevant, improper hypothetical	Plaintiffs' response to Defendants' Motion to Exclude Third Party Statements in Police Reports; relevant to whether Red Roof followed reporting procedures and what procedures were, Moyer as VP of ops has knowledge and experience to testify on topic; Objection to hypothetical is unclear - no explanation as to why the hypothetical is						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

199	12	199	21	Hearsay, foundation, irrelevant, improper hypothetical	Plaintiffs' response to Defendants' Motion to Exclude Third Party Statements in Police Reports; relevant to notice, Moyer as VP of ops has knowledge and experience to testify on topic, Objection to hypothetical is unclear - no explanation as to why the hypothetical is purportedly improper, in any event, the hypothetical is proper, as it is clear and						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

199	23	200	9	Hearsay, foundation, irrelevant, improper hypotehtical	nothing being introduced for the fact of the matter asserted, relevant to notice, unclear what the specific objection is on the hypothetical, but it is not incomplete and it is clear						
200	11	200	23	No objection							
201	3	201	20	No objection							
201	23	202	1	No objection							
204	4	205	22	No objection		202	6	202	22		
205	25	206	15	Foundation	asking him to testify on an email that he wrote himself, and why he chose to write what is in the email						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

206	17	208	4	Foundation, vague	unclear which question is being objected to. Line of questioning is asking him to testify on an email that he wrote himself, and why he chose to write what is in the email						
208	7	209	9	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

209	14	211	21	Foundation, argumentative, mistates prior testimony	unclear which question is being objected to. Line of questioning is asking Moyer to testify on an email that he wrote himself; the questions are not argumentative because they are not a conclusion but instead asking him to testify about why he wrote what he did; no misstating prior testimony, Moyer testified that he believed Buckhead had						
211	23	213	11	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

213	13	219	21	Foundation, argumentative, mistates prior testimony	unclear which question is being objected to. Section has no objections during deposition, so form objections waived(argumentative, misstates prior testimony); testifying as to his experience and perception of prostitution at the hotel, and the email where he wrote about prostitution at the hotel	219	11	220	19		
221	14	221	15	No objection							
221	21	224	3	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

226	4	226	21	Hearsay	Not being used for truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles)						
228	4	228	5	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

228	14	232	19	Improper hypotehtical, foundation	Moyer was VP of ops of various hotels and has knoweldge and experience based on his position and training to testify on questions. Objection to hypothetical is unclear - no explanation as to why the hypothetical is purportedly improper, in any event, the hypothetical is proper, as it is clear and complete						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

232	22	233	22	Improper hypotehtical, foundation	Moyer was VP of ops of various hotels and has knoweldge and experience based on his position and training to testify on questions. Objection to hypothetical is unclear - no explanation as to why the hypothetical is purportedly improper, in any event, the hypothetical is proper, as it is clear and complete						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

233	24	236	3 (end with "it")	Improper hypotehtical, foundation	Moyer was VP of ops of various hotels and has knoweldge and experience based on his position and training to testify on questions. Objection to hypothetical is unclear - no explanation as to why the hypothetical is purportedly improper, in any event, the hypothetical is proper, as it is clear and complete	236	5	237	2		
245	22	245	23	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

246	4	248	18	Hearsay	Not being used for truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles)	248	19	249	8		
249	9	252	23	Hearsay	Not being used for truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles)						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

253	14	256	8	Foundation, improper lay opinion	unclear which question is being objected to. Moyer is testifying about an email he received and responded to and his perception of that email, not asking for any expert opinion, just questions based on his knowledge and perception on the email						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

256	10	256	19	Foundation
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unclear which question is being objected to. Moyer is testifying about an email he received and responded to and his perception of that email

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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

256	22	266	18	Foundation, hearsay, irrelevant	Unclear what question is being objected to. Reports are not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles); testifying as VP of ops on what action was taken on reports of prostitution, relevant to notice and what RRI did in						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

266	20	271	10	Hearsay	unclear which question is being objected to, but waived any form objection; Reports are not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles)						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

271	25	274	14	Hearsay, irrelevant	unclear which question is being objected to, but waived any form objection; Reports are not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles); reviews relevant to show notice and response to reports						
274	17	274	23	Irrelevant	relevant to show notice and procedures of how RRI responds to complaints						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

278	1	279	15	Hearsay	Reports are not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles)	279	16	279	21		
281	9	282	16	Heaersay	Reports are not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles)	282	17	283	24		
284	13	284	14	No objection							



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

284	25	287	2	Hearsay	Reports are not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles)						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

287	5	287	13	Foundation, hearsay	Reports are not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles); asked to testify as VP of ops, based on his knowledge and training						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

287	16	288	17	Foundation, hearsay	unclear whats being objected to. Reports are not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles); asked to testify as VP of ops, based on his knowledge and training, and who got that specific report						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

289	4	290	24	Hearsay, foundation	Reports are not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles); asked to testify as VP of ops, based on his knowledge and training, and who got that specific report						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

291	2	292	14	Hearsay, foundation	Unclear what is being objected to. Reports are not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles); asked to testify as VP of ops, based on his knowledge and training, and who got that specific report						
293	9	293	22	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

294	11	298	4	Hearsay, irrelevant	Unclear what is being objected to. Reports are not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles); relevant to notice	298	5	298	8		
298	9	298	11	No objection							
298	18	301	12	Hearsay	Not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles)						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

301	19	302	1	Hearsay	Not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles)						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

302	7	305	25	Hearsay	Not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles); asked to testify as VP of ops, based on his knowledge and training, and who got that specific report						
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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

306	10	308	14	Hearsay	Not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles)						
310	4	311	20	Hearsay, foundation, improper attorney testimony, argumentative	Not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles)						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

311	23	312	21	Hearsay, foundation, improper attorney testimony, argumentative	Not used for the truth of the matter asserted (See Doc. 351, Response to Defendants' motion to Exclude Unverified Customer Reviews and Newspaper Articles)						
312	24	312	25	Foundation	Moyer was VP of ops overseeing that hotel and has knowlege and experience to testify on that question						
313	2	313	6	No objection							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

313	8	313	17	Vague, compound	Question is specific-- whether in hindsight he believed that the property had a problem with prostitution. Question was clear and witness understood the question						
313	19	314	8	Vague, foundation	Question is specific--asks the witness to whether he believed there was a problem with prostitution, taking into account the emails that were reviewed. Moyer is being asked to testify as VP of ops who oversaw the hotel						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

314	10	315	17	Vague, foundation, improper lay opinion	unclear what question is being objected to. Question specifically asks if he believes the property had issue with prostitution, not asking for expert opinion, asking for opinion based on his experience as VP of ops overseeing that hotel						
-----	----	-----	----	---	--	--	--	--	--	--	--

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

315	19	315	20	Vague, foundation, improper lay opinion	Question specifically asks if he believes the property had issue with prostitution, not asking for expert opinion, asking for opinion based on his experience as VP of ops overseeing that hotel						
315	25	316	6	Vague, foundation, improper lay opinion	Question specifically asks if he believes the property had issue with prostitution, not asking for expert opinion, asking for opinion based on his experience as VP of ops overseeing that hotel						
						329	7	329	11		

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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

[illegible]

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	Park, John
<b>DEPOSITION DATE:</b>	8/25/2022

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
9	22	9	24			93	23	94	2		
10	6	10	8			94	4	94	8		
14	14 (begin with "these")	14	18								
15	1	15	12								
26	1	26	6								
27	7	27	7								
27	12	28	3								
30	1	30	8								
31	18	31	25								
34	23	35	7								
35	11	35	18								
38	10	38	16								
39	25	40	5								
41	4	41	7								
41	21	42	6								
43	6	43	12								
43	22	44	3								
45	9	45	20								
46	6	46	8								
46	21	46	24								
47	18	47	21								
51	4 (begin with "we'll")	51	9								
51	25	52	3								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

53	11	54	9								
55	6	56	2								
56	22	57	11								
57	14	57	18								
58	22	59	13								
60	9	60	12								
60	14	60	16 (end with "office")								
60	20	60	21								
61	9	61	9								
61	24	62	7								
63	1	63	12								
63	22	64	3								
65	17	65	20								
65	24	65	25								
66	5 (begin with "we")	66	12								
66	9	66	10								
67	1	67	22								
68	11	68	19								
68	22	69	9								
69	14	69	19								
72	4	72	6								
72	9	72	13								
73	24	74	2								
75	9	75	11								
75	14	75	17								
75	20	75	25								
77	24	81	7								
81	20	82	1								



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

83	24 (begin with "We")	84	13								
84	23	86	6								
86	14	87	8								
87	16	89	9								
89	11	89	12								
91	17	91	19								
91	21	92	1								
92	7	92	13								
92	17	92	23								
92	25	93	5								
93	19	93	22								
94	9	94	12	personal knowledge only							
94	23	94	23	personal knowledge only							
98	1	98	7								
98	14	98	16								
98	18	98	18								
99	2	99	11								
101	2	101	7								
101	13	101	19	relevance; prejudicial; no finding of punitives							
104	13	105	11	relevance; prejudicial; no finding of punitives							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

105	14	106	4	relevance; prejudicial; no finding of punitives							
107	5	109	21	relevance; prejudicial; no finding of punitives							
109	25	111	19	relevance; prejudicial; personal information							
111	22	112	3								
112	5	112	10								
114	14	115	15	relevance; prejudicial; personal information							
116	22	117	2	relevance; prejudicial							
117	5	117	5	relevance; prejudicial							
117	8	117	23	relevance; prejudicial							
118	9	119	18	relevance; prejudicial; personal information							
122	17	122	25								
124	14	125	17								
125	22	126	20								
127	14	129	4								
129	13	130	3								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

130	8	130	18	relevance as other properties; prejudicial							
131	9	132	6	relevance as other properties; prejudicial							
132	13	132	17	relevance as other properties; prejudicial							
132	19 (begin with "let's")	133	22	relevance as other properties; prejudicial							
134	4	134	5	relevance as other properties; prejudicial							
134	7	134	9	relevance as other properties; prejudicial							
134	14	134	25	relevance as other properties; prejudicial							
135	2	135	9	relevance as other properties; prejudicial							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

135	17	135	21	relevance as other properties; prejudicial							
136	3	136	11	relevance as other properties; prejudicial							
137	15	137	17	relevance as other properties; prejudicial							
137	24	138	4	relevance as other properties; prejudicial							
138	14	138	19	relevance as other properties; prejudicial							
138	21	138	25	relevance as other properties; prejudicial							
139	11	140	6	relevance as other properties; prejudicial							
140	13	141	14	relevance as other properties; prejudicial							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

141	18	142	8	relevance as other properties; prejudicial							
142	12	143	1	relevance as other properties; prejudicial							
143	5	143	10	relevance as other properties; prejudicial							
143	20	143	21	relevance as other properties; prejudicial							
143	23	144	20	relevance as other properties; prejudicial							
144	24	145	2	relevance as other properties; prejudicial							
145	12	145	13	relevance as other properties; prejudicial							
145	16	145	23	relevance as other properties; prejudicial							

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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

[illegible]

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	Sarkisian, Michelle
<b>DEPOSITION DATE:</b>	10/20/2021

**Designations Can Only be Used if Witness is  
Unavailable to Testify Live**

**AFFIRMATIVE DEPOSITION DESIGNATIONS****COUNTER DESIGNATIONS**

<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>	<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>
14	22	14	24								
15	3	15	7								
16	1 (begin with "So")	22	4	improper lay opinion; foundation;							
23	6 (begin with "At")	25	4	hearsay; foundation; lack of personal knowledge;		64	21	65	4		
						65	10	66	24		
						88	17	88	20		
						88	25	89	3		
25	9	26	22	hearsay; foundation; lack of personal knowledge;		67	13	67	22		
						68	5	68	18		
						69	25	70	10		
27	1	27	8								
27	14 (begin with "And")	27	20								
28	1 (begin with "Can")	28	19	hearsay; foundation; lack of personal knowledge;		86	8	86	23		
						87	1	87	11		
29	1	29	3								
29	10	29	15	hearsay; lack of authentication; foundation;							
29	21 (begin with "Does")	30	13	hearsay; lack of authentication; foundation;							
30	20 (begin with "I")	31	17	hearsay; lack of authentication							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

31	21 (Begin with "So")	32	10	hearsay; lack of authentication		32 64	11 21	32 65	18 4		
32	21	33	3								
33	9 (begin with "And")	34	5	hearsay							
34	12	34	15								
35	6 (begin with "And")	35	10								
35	11 (begin with "if")	35	25	hearsay; foundation; lack of personal knowledge							
36	3	36	7								
36	10 (begin with "Could")	37	17	hearsay; foundation; no personal knowledge; (37:3-37:4 - misleading/prejudicial; misstates prior testimony)		73 74 75	7 22 4	74 74 76	15 24 22		
38	12	39	10	hearsay; foundation; lack of personal knowledge;		87	24	88	13 (end at not)		
39	15	39	19								
39	23	39	23	lack of personal knowledge; foundation;							
39	25 (begin with "on")	40	2								
40	11	40	11	hearsay; foundation; lack of personal knowledge;							
40	12 (begin with "And")	40	21								
40	22 (begin with "yes")	40	25								



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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

[illegible]

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

WITNESS NAME: Stocker, Gregory

DEPOSITION DATE: 5/11/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS****COUNTER DESIGNATIONS**

<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>	<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>
8	9	8	11								
8	14	8	16								
18	25	19	16								
20	1	20	16								
21	17	22	2								
22	10	22	16								
23	10	23	24								
28	3	29	17								
30	5	32	16								
32	24	33	11								
33	16	33	19								
33	21	33	25								
34	2	34	6								
34	16	35	3								
35	7	36	18								
37	18	37	22								
37	24	39	22								
40	10	40	18								
41	3	41	11								
41	14	42	1								
42	9	42	20								
43	4	43	18								
44	11	45	25								
49	17	50	1								
50	3	50	5								

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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

[illegible]

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	Stocker, Gregory
<b>DEPOSITION DATE:</b>	5/11/2022

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
9	17	9	19								
9	22	9	25								
10	4	10	22								
15	14	15	19								
17	7	17	10								
26	10	26	23								
27	10	27	25	Legal Conclusion							
28	11	28	14								
28	16	29	1								
29	3	29	3								
29	5	29	11								
29	21	29	22								
31	3 (begin with "This")	31	16								
31	25	32	13								
33	3	33	15								
34	6	34	9								
34	11	34	19								
36	17	37	14								
37	19	37	22								
38	8	38	11								
38	15	38	19								
38	22	38	23								
39	1	39	3								
39	6	39	11								
39	14	39	15								
40	1	41	1								
42	18	42	24								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

43	9	43	10	Legal conclusion; Assumes duty that does not exist							
43	12	43	16	Legal conclusion; Assumes duty that does not exist							
43	19	44	11	43:24-25 and 44:1-3 Legal conclusion; Assumes duty that does not exist							
55	9 (begin with "What")	55	11								
55	13	55	15								
55	20	56	12								
57	4	57	14								
57	20	57	23								
59	17 (begin with "In")	60	7								
60	13	60	15								
61	24	62	7								
63	2	63	16								
64	14	64	14								
64	16	64	17								
65	21	66	2								
66	7	66	13								
66	15	66	17								
66	19	67	1								
67	3	67	6								
67	24	67	25								
68	2	68	2								
68	13	68	15								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

68	17	68	22								
70	5	70	20	70:15-20 Relevance (seeks information about 2020)							
77	5	77	19								
78	4	78	13								
82	9	82	14								
82	18	83	3								
83	12	83	14								
83	16	83	25								
94	23	95	6								
95	8	95	14								
96	7	96	13								
96	15	96	16								
100	14	101	6								
102	3	102	5								
102	9	102	13								
120	22	120	22								
121	5	122	4	121:17-15 and 122:1-2 Hearsay							
122	6	122	12								
122	15	122	15								
122	17	122	17								
123	4	123	15								
123	19	129	23								
124	4	124	7								
124	9 (begin with "the")	125	1	124:8-14 Hearsay							
125	3	125	3								
125	8 (begin with "Exhibit")	126	4	125:22-25 and 126:1-6 Hearsay							
126	6	126	19								
127	5	127	15	127:5-11 Hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

128	2	128	2								
128	10	128	21								
129	9	129	10								
129	16	129	17								
130	3	130	6								
132	19	133	21								
134	19	134	22	Hearsay							
135	1	135	13	135:1-8 Hearsay							
136	2	136	10	136:1-6 Hearsay							
136	13	137	18								
137	20	137	22								
138	2	138	8								
138	12	138	23								
139	12	139	19								
139	21	140	7								
140	9	140	16								
140	18	140	21								
140	23	141	2								
141	22	142	14								
142	19	142	20								
143	4	143	6								
143	8	143	8								
143	11	143	23								
144	3	144	6								
144	8	144	18								
144	20	144	20								
145	1	145	6								
145	11	145	20	145:11-13 Hearsay							
146	1	146	16								
146	22	147	1								
147	3	147	3								
153	24	154	17								
154	22	154	22								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

155	14 (Begin with "Plaintiffs'")	155	19								
156	23	157	12								
158	18	158	25								
159	6	159	8								
159	22	160	8								
161	7	161	25	161:12-18 Hearsay							
162	24	163	13								
165	5	165	7								
165	9	165	15								
166	1	166	7								
166	9	166	21								
168	16	168	24								
169	1	169	5								
169	16	169	19								
169	21	170	3								
170	16	170	24								
173	11	174	13	173:11-25 and 174:1-13 Relevance (not Smyrna or Buckhead)							
174	22	175	6	174:22-25 Relevance (not Smyrna or Buckhead) 175:1-6 Relevance							
175	10	176	3	175:10-25 Relevance, 176:1-3 Relevance (not Smyrna or Buckhead)							



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

177	24	178	5	177:24-25 and 178:1-5 Relevance							
180	6	180	24	Relevance (not Smyrna or Buckhead)							
181	1	181	3	181:1-18 Relevance							
181	6	181	18	181:1-18 Relevance							
183	6	183	6								
183	17	183	20								
183	25	184	13								
185	4	186	1								
189	16	189	21								
190	8	190	10								
190	18	190	20								
191	25	192	16	191:25 Relevance, 192:1-16 Relevance; (Patel's ownership)							
192	20	193	24	192:20-25 Relevance; (Patel's ownership), 193:1- 24 Relevance							
194	7	194	24	Relevance							
195	1	195	5	195:1-25 Relevance; hearsay							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

195	7	196	25	195:1-25 and 196:1-25 Relevance; hearsay							
197	6	198	16	197:6-25 Relevance; hearsay, 198:1-16 Relevance							
199	5	199	5								
199	8	200	2	199:8-25 and 200:1-2 Relevance							
200	4	200	4								
200	9	200	22	Relevance							
204	7	204	14	203:1-7 and 204:7-14 Relevance							
204	25	205	7	204:25 Relevance							
207	1	207	18								
207	24	208	4								
208	10	208	15	Relevance (post 2017; 2020 meeting)							
208	18	208	18								
208	23	209	12	208:23-25 Relevance (post 2017; 2020 meeting)							
209	14	210	2	209:10-12; 14-25 Relevance							
210	11	210	19	210:1-2; 11-25 Relevance							
210	21	211	3	210:11-25 and 211:1-3 Relevance							

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**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

[illegible]

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	Thomas, Michael
<b>DEPOSITION DATE:</b>	2/2/2022

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
11	12	11	14								
14	8 (begin with "how")	14	11								
14	20 (begins with "in")	15	4			15 127 127	14 2 15	15 127 128	16 5 10		
15	17	16	1								
16	4 (Begin with "who")	16	13								
17	10 (Begin with "And")	19	12								
19	16	19	18								
20	8	20	11								
21	8	21	18								
22	1	22	8								
22	18	22	21			22	24	23	6		
23	11	25	15								
25	18	26	2			25	3	25	20		
27	2	27	7	leading; speculation; improper lay opinion							

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

27	10	27	24 (end with "out")	speculation; unduly prejudicial		27	24	27	25		
28	1	28	16								
28	18	29	7								
29	15	29	18								
29	20	29	20								
29	22	29	24	speculation; no personal knowledge;		30	3	30	7		
30	1	30	1								
30	12 (Begin with "I")	32	12	speculation; leading; improper attorney testimony (32:7-12)							
32	15	35	8	speculation; leading; hearsay; speculation; lack of personal knowledge;							
35	11	35	18	speculation; no personal knowledge;							
35	21	36	23								
37	1	37	5								
37	10	37	23	leading; improper attorney testimony;							
38	2 (begin with "if")	38	17								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

38	19	39	4								
39	5 (begin with "did")	41	16								
41	19	41	25								
42	2	42	18								
42	20	42	20								
43	1 (begin with "but")	43	5	speculation;							
43	7	44	6								
44	8	44	20	leading; hearsay;							
44	24 (begins with "were")	45	17	speculation;							
45	19	46	4	speculation; lack of personal knowledge;							
46	7	46	10								
46	19 (begins with "did")	48	6								
48	12	48	15	leading; improper attorney testimony; speculation; foundation		49 51 58 60	25 18 24 17	50 51 59 61	13 22 11 8		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

48	17	48	21	leading; improper attorney testimony; speculation; foundation		49 51 58 60	25 18 24 17	50 51 59 61	13 22 11 8		
48	23	49	2	leading; improper attorney testimony; speculation; foundation		49 51 58 60	25 18 24 17	50 51 59 61	13 22 11 8		
51	23	53	1	hearsay							
53	3	53	10	hearsay							
54	4	54	15	relevance;							
76	17	76	25								
77	20	78	15			77 78	12 16	77 78	19 20		
78	21	79	18			79	19	80	5		
83	7 (begin with "And")	84	1			84 86 88	10 12 24 (begin with "this")	85 86 89	21 25 22 (end with "some")		
84	6	85	18								
95	3	98	10	speculation; lack of personal knowledge;							
98	13 (begin with "how")	98	21								
98	23	99	17								
99	19	99	22			99	23	100	23		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

[illegible]



**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

WITNESS NAME: Valerio, Joy											
DEPOSITION DATE: 1/13/2023											
					Designations Can Only be Used if Witness is Unavailable to Testify Live						
<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
8	17	8	19								
9	1	9	11								
14	7	18	9	Page 14, lines 11-25; Page 15 1-25: Hearsay Page 16, lines 18-25 Hearsay Page 17, line 1-10 Hearsay	14:11-25, 15:1-25 - not hearsay, offered not for the truth but for the basis for why Ms. Valerio believed Fonseca was who he said he was and when and why Ms. Valerio came to the conclusion that JD3 was being trafficked.  16:18-25 and 17:1-10: not hearsay - these are not statements offered for the truth but questions Fonseca asked of Joy, references to photos he sent to her and she viewed, and the fact that he gave her his contact information, none of which is offered for the truth of any statement.						

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

19	25 (begin with "Was")	21	12	Page 21, line 6-12 Speculation, lack of foundation, relevance	Defendants waived these objections by failing to object during deposition. And Ms. Valerio has a foundation for responding to the defense question about how her husband might respond because she is her husband's spouse. Moreover, how JD3's parents responded to allegations that their daughter was involved in trafficking is relevant to this case about the trafficking of JD3.	19	3	19	15		
						22	12	23	8		
						25	13	25	23		
						26	7	26	14		
						26	25	27	8		
						27	9	27	21		
						27	25	28	2		
						28	6	28	10		
						28	17	28	21		
						29	14	29	16		
						30	10	30	21		
						32	12	32	21		
						32	24	33	11		
						33	16	33	23		
						34	2	34	5		
						34	7	34	11		
						34	20	35	4		
						35	15	35	24		
						36	16	38	9		
						38	15	41	10		
						41	13	41	21		
						43	2	43	4		
						43	9	43	25		
						44	5	44	11		
						44	15	45	20		
						46	1	46	4		
						47	1	47	10		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

						49	21	49	24		
						50	25	51	11		
						64	2	64	7		
						64	19	65	15		
						65	20	65	23		
						66	13	66	25		
						67	23	69	7		
						75	19	76	8		
						76	10	76	13		
						76	15	76	16		
						76	25	78	5		
						79	5	79	11		
						81	6	81	9		
						81	13	81	19		
						81	21	81	21		
						81	25	82	4		
						82	8	82	25		
						83	8	83	25		
						84	5	84	5		
						84	10	84	12		
						84	14	84	15		
						84	15	85	16		
						86	2	86	3		
						86	7	86	13		
						86	16	87	20		
						87	22	88	19		
						90	12	90	18		
						90	21	91	8		
						91	17	91	24		
						93	4	93	7		
						93	9	94	10		
						94	13	94	21		
						95	11	95	18		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

96	9	97	5			98	8	99	25		
						109	8	109	23		
						112	23	113	6		
						113	21	113	23		
						114	21	114	25		
						115	9	115	16		
						115	18	115	18		
116	23	118	25	Page 117, lines 24-25 Relevance; Page 118, lines 1-25 Relevance	JD3's feeling of unworthiness and shame is relevant to JD3's damages.	119	1	120	2		
						120	5	120	7		
						121	3	121	6		
121	7	121	13			121	14	121	16		
						122	13	122	15		
						122	19	122	22		
						124	8	124	9		
						124	11	124	11		
126	3 (begin with "Mrs.")	134	13	Page 127, lines 24-25 Speculation Page 128, lines 1-8 Speculation	Does not call for speculation. Ms. Valerio describes how she felt based on what she saw and how JD3 appeared to her based on what Ms. Valerio saw. Moreover, defense did not object to the form of the question during deposition and thus waived form objections under Rule 32(b)(3). <i>See, e.g., House v. Players'</i> <i>Dugout, Inc.</i> , No. 3:16-CV-00594- RGJ, 2021 WL 4898071, at *9 (W.D. Ky. Oct. 20, 2021) ("As Plaintiffs' objections to foundation and speculation could have been cured at the time of the deposition or relate to the form of the question or answer, they are waived under Fed. R. Civ. P. 32(d)(3)(A) and (B).")	134	14	135	13		
						138	10	138	14		
						138	25	139	4		
						139	14	139	17		
						139	19	139	20		
						139	22	141	3		
						141	12	141	22		
						143	21	144	2		
						144	5	144	12		
						144	15	144	18		
						144	20	144	21		
						145	1	145	21		
						146	2	147	25		
						154	3	155	20		
						155	22	156	4		
						156	25	157	19		
						163	21	164	3		
						164	14	164	16		
167	10	167	12								

[illegible]

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	Vittatoe, Vincent
<b>DEPOSITION DATE:</b>	5/3/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS**

<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
5	4	5	5								
6	9	6	14	Page 6: lines 11-12 (legal conclusion; assumes facts not in evidence; misleading)							
22	3 (begin with "Is")	22	4								
22	6	22	7								
22	21	22	22								
22	24	22	24			22	25	22	25		
23	16	23	17			23	1	23	4		
23	19	23	21			23	11	23	15		
24	8	24	10								
24	25	25	4								
29	15	29	25								
37	4	37	9								
37	11	37	23								
38	1	38	3								
47	1	47	16								
48	13	49	1								
62	14	62	20								
66	6	66	8								
66	10	66	12								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

70	6	70	22	Page 70: lines 12-22 (relevance; speculation; more prejudicial than probative)							
70	24	70	24								
71	4	71	6								
71	8	71	16								
73	4	73	14								
77	13	77	20								
78	24	79	12								
79	24	80	21	Page 79: line 24 unnecessary/incomplete sentence							
101	13	101	16								
102	5	103	1								
115	22	116	9								
116	12	117	12								
118	4	118	14								
118	16	118	19								
120	20	121	6								
121	8	121	12								
121	14	122	2								
122	4	122	5								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

131	20	133	4	Page 131: lines 20-25 (hearsay; relevance; more prejudicial than probative); Page 132: lines 1-25 (hearsay; relevance; more prejudicial than probative); Page 133: lines 1-4 (hearsay; relevance; more prejudicial than probative)							
133	6	133	23	Page 133: lines 6-23 (hearsay; relevance; more prejudicial than probative)							
137	18	137	25	Page 137: Lines 21-25 (improper question; leading; relevance; improper lay opinion; speculation; assumes facts not in evidence)							



[illegible]

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

WITNESS NAME: Wehrle, Michelle

DEPOSITION DATE: 8/9/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS****COUNTER DESIGNATIONS**

Page/Line Begin		Page/Line End		Objections	Replies to Objections	Page/Line Begin		Page/Line End		Objections	Replies to Objections
8	1	8	3								
9	10	9	13			12	21	13	11		
						16	15	16	25		
						17	7	17	10		
15	22	16	2								
16	5	16	14								
18	6	18	9								
19	23	20	2								
33	14	33	21			33	22	34	4		
34	5 (begin with "so")	36	21			157	5	158	2		
						158	8 (begin with "Mr.")	160	24		
53	23	54	6								
54	11	54	11								
54	15	55	5								
55	8 (begin with "So")	55	9	Designation appears unclear - assume should end at 55:19.							
56	5	56	9								
57	5	57	10								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

57	19 (begin with "Section")	58	3								
58	7	58	19			41	15	41	23		
						41	25	42	6		
						42	22	43	2		
						43	5	43	5		
						43	10	43	12		
						43	19	43	21		
						44	18	44	19		
						48	18	48	25		
						52	21	53	14		
58	25	59	7								
59	12	59	19								
59	21	60	9								
60	17	61	5								
61	9 (begin with "you said")	61	16								
61	19	61	21								
62	14	62	17								
67	1	67	13			67	14	67	23		
67	24	68	1								
68	3	68	4								
68	6	68	7								
82	22 (begin with "if")	82	23								
83	1	84	14								
85	4	86	4								
86	17	87	12								

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

87	15 (begin with "This")	88	3								
88	16 (begin with "This")	89	8								
90	25	91	3								
91	6	91	6								
94	18	94	23			95	8 (begin with "And")	95	10		
95	14	95	15 (end with "231")			96 96	1 24 (begin with "As")	96 97	3 5		
95	17	95	25								
98	8	100	5			100	6	100	14		
100	23	101	8			101	9	101	23		
102	19	104	15								
104	24 (begin with "So")	105	7			105 105 105	8 13 16	105 105 106	9 14 16		
107	23	108	6			108 108	21 25	108 109	23 16		
109	17	111	8	hearsay;							
111	25	113	2	hearsay;							
113	4	113	5	misstates prior testimony							
113	7	113	13								
113	17	113	24								
114	1	114	7			159	23	160	24		
114	10	114	18			159	23	160	24		
114	20	114	24			159	23	160	24		

**ATTACHMENT J-1 PLAINTIFF DEPOSITION DESIGNATIONS WITH DEFENDANT OBJECTIONS AND COUNTERS**

[illegible]

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	Andrew Alexander
<b>DEPOSITION DATE:</b>	6/27/2022

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>					<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>	<b>Page/Line End</b>	<b>Objections</b>	<b>Replies to Objections</b>		<b>Page/Line Begin</b>	<b>Page/Line End</b>	<b>Objections</b>	<b>Replies to Objections</b>		
10	21	10	23							
13	4	14	1							
15	9	15	14							
23	1	23	12		25	4	25	9		
					25	14	25	18		
					25	20	25	20		
					25	22	26	1		
					26	4	26	24		
					27	14	27	18		
					28	1	28	7		
36	5	36	16		36	14	37	13		
49	6	49	11		45	16	46	5		
					46	7	46	14		
					47	25	48	9		
49	15	50	2							
72	11	73	1							
73	5	73	10		74	8	74	20		
					78	16	78	19		
					82	1	82	4 (end at "it.")		
					82	16	82	20		
					86	11(begin at "But")	86	23		
					86	25	87	1		
					87	3	87	11		
93	13	94	17		92	25	93	3		
					93	6	93	12		
95	15	95	24		95	8	95	14		
					98	1	98	4		
					98	6	98	15		
					100	17(begin at "When")	101	8		
					102	7	102	16		
					102	19	102	25		
105	4	105	11		104	19	104	24		
105	20	105	23							

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

106	12	106	18			107	19	108	2		
						108	4	108	7		
						108	10	108	11		
						108	19	108	25		
106	20	107	14								
112	1	112	4			110	25	111	25		
112	6	112	6								
116	3	116	10			114	13	114	22		
						117	1	117	7		
190	20	191	6			190	13	190	20 (end with "police.")		
						191	7	191	9 (end with "minor.")		
191	9	191	11								
191	16	191	24								
229	21	229	23			229	13	229	16		
						229	19	229	19		
229	25	230	2								
230	12	231	8	Irrelevant, prejudicial, confusing, and misleading. There has been no evidence offered in this case that racial profiling is related to identifying prostitution and/or sex trafficking taking place at hotels, other than by Defendants to introduce irrelevant, prejudicial, and confusing evidence and to mislead the jury.							
232	2	232	9	Irrelevant, prejudicial, confusing,							
233	17	234	2								
234	4	234	8								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

234	10	235	15	234:25-236:7 Irrelevant, prejudicial, confusing, and misleading. There has been no evidence offered in this case that racial profiling is related to identifying prostitution and/or sex trafficking taking place at hotels, other than by Defendants to introduce irrelevant, prejudicial, and confusing evidence and to mislead the jury.						
235	17	235	17	See objection above						
235	19	236	2	See objection above						
236	4	236	7	See objection above		236	25	237	16	
						237	18	237	19	
						237	21	238	8	
						238	12	238	13	
239	1	239	10	239:4-6, 8-10 Leading						
239	12	239	12							
239	14	239	16	Leading						
239	18	239	18							
239	20	240	5	Leading						
240	11	240	23							
240	25	240	25							
241	2	241	25			242	1	242	3	
						242	9	242	14	
						242	17	242	25	



**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b> Jane Doe 1 (Kristin Krawczyk)											
<b>DEPOSITION DATE:</b> 6/9/2022-6/10/2022											
<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
7	5	7	12								
7	24	8	6			8	9	8	12		
8	24	9	1			9	2	9	3		
12	6	12	11								
12	22	12	23								
13	1	13	6								
14	6	14	9			14	10	14	11		
14	12	14	23								
15	12	15	15								
16	12	16	13			16	6	16	11		
17	1	20	13	Relevance; Rule 403 (waste of time); Rule 404(b)							
24	1	24	2			24	3	24	9		
25	3	25	14	Relevance; Rule 403 (prejudicial, confusion, waste of time); Rule 404(b)							
28	2	28	25	Relevance; Rule 403 (prejudicial, confusion, waste of time); Rule 404(b)							

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
29	6	29	8	Relevance; Rule 403 (prejudicial, confusion, waste of time); Rule 404(b)		29	9	29	12		
34	7	34	11								
34	19	35	1			35	2	35	16		
35	17	36	11			36	12	36	22		
36	23	37	7			37	8	37	12		
38	11	39	9								
39	13	39	14								
39	20	39	24								
40	7	40	15	Relevance; Rule 403 (confusion, waste of time)		40	20	40	21		
41	8	41	13			40	22	41	7		
						42	22	43	4		
45	7	45	11	Relevance; Rule 403 (confusion, waste of time)							
48	22	49	12								
49	17	49	17								
49	19	49	19								
50	5	50	8	Relevance; Rule 403 (confusion)							
52	7	52	21								
53	20	53	22								
53	24	54	8								
54	12	56	10								
56	16	56	19								
56	25	57	13								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
57	19	57	20								
57	23	57	24								
58	3	58	4								
58	11	58	20			58	21	59	9		
60	15	60	16								
60	18	60	20								
60	22	61	9								
61	24	62	1			62	2	62	20		
62	21	62	24								
63	3	63	5								
63	9	63	11			63	12	63	25		
64	1	64	9								
64	14	64	18								
72	18	73	3			73	4	73	10		
74	7	74	8			74	9	74	9		
74	13	74	14								
77	1	77	5								
77	15	78	8	Relevance; Rule 403 (prejudice, confusion, waste of time); Rule 404(b)							
78	19	78	22	Relevance; Rule 403(prejudice); Rule 404(b)							
79	16	79	25	Relevance; Rule 403 (prejudice, confusion, waste of time); Rule 404(b)		80	13	80	21		

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

AFFIRMATIVE DEPOSITION DESIGNATIONS						COUNTER DESIGNATIONS					
Page/Line Begin		Page/Line End		Objections	Replies to Objections	Page/Line Begin		Page/Line End		Objections	Replies to Objections
81	4	81	15	Relevance; Rule 403 (prejudice, confusion, waste of time); Rule 404(b)							
82	3	82	13	Relevance; Rule 403 (prejudice, confusion, waste of time); Rule 404(b); Rule 609							
82	15	82	23	Relevance; Rule 403 (prejudice, confusion, waste of time); Rule 404(b); Rule 609							
83	4	83	10	Relevance; Rule 403 (prejudice, confusion, waste of time); Rule 404(b); Rule 609							
84	4	84	21	Relevance; Rule 403 (prejudice, confusion, waste of time); Rule 404(b); Rule 609							
85	19	86	4	Relevance; Rule 403(prejudice, confusion, waste of time)							

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

AFFIRMATIVE DEPOSITION DESIGNATIONS						COUNTER DESIGNATIONS					
Page/Line Begin		Page/Line End		Objections	Replies to Objections	Page/Line Begin		Page/Line End		Objections	Replies to Objections
86	14	87	2	Relevance; Rule 403(prejudice, confusion, waste of time)							
87	5	87	7	Relevance; Rule 403(prejudice, confusion, waste of time)		87	8	87	9		
87	10	87	25	Relevance; Rule 403(prejudice, confusion, waste of time)							
88	10	88	17	Relevance; Rule 403(prejudice, confusion, waste of time)							
93	13	93	23	Relevance; Rule 403(prejudice, confusion, waste of time)							
94	1	94	22	Relevance; Rule 403(prejudice, confusion, waste of time)							
96	14	97	4	Relevance; Rule 403(prejudice, confusion, waste of time); Rule 404(b)							

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

AFFIRMATIVE DEPOSITION DESIGNATIONS						COUNTER DESIGNATIONS					
Page/Line Begin		Page/Line End		Objections	Replies to Objections	Page/Line Begin		Page/Line End		Objections	Replies to Objections
97	22	98	13	Relevance; Rule 403(prejudice, confusion, waste of time); Rule 404(b)							
98	23	99	2	Relevance; Rule 403(prejudice, confusion, waste of time); Rule 404(b)							
99	5	99	8	Relevance; Rule 403(prejudice, confusion, waste of time); Rule 404(b)							
99	17	99	18	Relevance; Rule 403(prejudice, confusion, waste of time); Rule 404(b)							
99	24	100	21	Relevance; Rule 403(prejudice, confusion, waste of time); Rule 404(b); Rue 609							
100	24	101	1	Relevance; Rule 403(prejudice, confusion, waste of time); Rule 404(b)							

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
101	6	102	14	Relevance; Rule 403(prejudice, confusion, waste of time); Rule 404(b)							
102	18	103	13	Relevance; Rule 403(prejudice, confusion, waste of time); Rule 404(b)							
103	18	104	10	Relevance; Rule 403(prejudice, confusion, waste of time); Rule 404(b)							
105	11	105	16								
105	18	106	12								
106	20	106	23	Relevance; Rule 403(prejudice, confusion, waste of time); Rule 404(b)							
107	6	107	15	Relevance; Rule 403(prejudice, confusion, waste of time); Rule 404(b)							
112	17	113	2								
113	6	113	16								
114	9	114	11			114	12	115	15		
116	11	116	14								
117	7	118	17			118	18	118	24		

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
118	25	119	8								
119	15	121	18	Relevance; hearsay; Rule 404(b)		121	19	121	24		
122	9	122	17			122	18	122	24		
123	16	123	23								
124	13	124	18								
127	16	127	17			125	4	126	15		
						126	18	127	8		
						127	10	127	14		
127	19	127	19								
127	21	128	2	Relevance; Rule 403 (prejudice, confusion, waste of time, cumulative)							
128	8	128	11								
128	15	128	24	Relevance; Rule 403 (prejudice, confusion, waste of time, cumulative)							
129	18	131	5								
131	21	131	23								
132	11	132	17								
133	2	133	4								
133	21	133	24			133	2	133	20		
134	8	134	13								
134	20	135	2			134	19	134	19		
135	6	135	25			135	3	135	5		
137	6	137	13			137	14	138	4		



**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
138	18	139	1								
139	10	139	17								
139	23	139	24								
140	1	140	9								
142	2	142	9								
142	16	142	21			142	22	142	23		
142	24	143	6								
143	9	143	12								
144	9	144	18								
144	23	144	24								
145	4	145	7			145	8	145	10		
145	11	145	21								
145	24	146	8								
146	19	146	25								
147	12	147	18			147	19	148	14		
149	2	151	1	Relevance; Rule 403 (confusion, waste of time)							
151	9	152	3	Rule 403 (confusion, waste of time)							
154	2	154	21			154	22	154	25		
155	1	155	8								
155	10	155	16								
157	12	158	13								
158	15	158	15			158	17	158	21		
						158	23	159	23		
162	6	162	7								
162	9	162	9			161	15	161	16		
						161	18	162	4		

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
162	11	162	12	Misrepresents prior testimony							
162	14	162	14	Misrepresents prior testimony							
162	16	162	19								
162	23	163	1								
163	3	163	5								
163	8	163	13			163	14	163	21 (end with "Red Roof Inn")		
167	22	168	5								
180	18	181	10								
181	18	181	19			181	11	181	12		
182	1	182	4								
182	21	183	23	Relevance; Rule 403 (prejudice, confusion, waste of time)		183	24	184	8		
184	16	185	1			185	2	185	8		
185	9	186	8								
186	19	187	6								
189	16	189	23								
190	3	190	12								
191	3	191	8			191	9	191	13		
191	14	191	20			192	12	192	13		
192	14	192	18			192	19	193	20		
193	21	193	24			194	4	195	6		
						196	4	196	14		
196	20	197	15			197	16	199	7		
199	8	200	11								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
200	13	200	13								
200	15	200	16			200	17	202	22		
203	18	204	12			203	3	203	17		
						204	13	205	7		
205	8	205	17			205	17	207	1		
207	5	207	14			207	15	207	21		
						208	7 (begin with "Who")	208	21		
208	25	209	5			208	22	208	24		
210	11	210	20								
210	22	211	12								
211	19	212	9			212	10	213	23		
213	24	214	19								
217	3	217	13			217	14	218	3		
218	25	219	5								
219	12	219	25			220	1	220	14		
						221	9	221	15		
224	11	224	15			222	24	223	10		
224	17	224	18								
224	20	224	21								
224	23	224	23								
228	21	228	25								
231	23	231	25			231	9 (begin with "The")	231	22		
233	2	233	19								
234	2	234	15								
238	9	238	22			237	22 (begin with "How")	238	8		

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
241	5	241	12			240	10	240	4		
241	14	241	21			241	13	241	13		
						242	4	242	8		
247	17	247	23								
248	4	248	6			248	7	248	17		
249	11	250	5								
257	4	257	11			257	12	257	19		
257	20	258	3								
258	7	258	10			258	11	258	11		
258	12	258	17								
259	2	259	10			258	18	259	1		
259	16	259	20			259	21	260	7		
263	18	264	3								
265	21	266	23								
267	5	267	6			267	7	267	8 (end with "Shivers")		
267	13	267	24								
268	2	268	15								
268	17	268	17								
268	19	268	23	268:23: Calls for speculation							
268	25	268	25	Calls for speculation							
269	2	269	3								
269	6	269	7								
269	9	269	14								
269	19	270	2								
270	12	270	24								
271	7	271	14								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
274	24	275	3	Relevance; Rule 404(b)							
275	10	275	14	Relevance; Rule 404(b)							
275	18	276	23	Relevance; Rule 404(b)							
277	25	278	17								
278	19	279	24			278	18	278	18		
280	1	280	13			279	25	279	25		
280	17	280	22			280	14	280	16		
						280	23	281	9		
282	8	282	13								
284	1	285	2								
285	21	286	1								
Vol. 2 6/10/2022											
295	1	296	7								
296	17	296	23								
297	4	298	17			298	18	298	19		
298	23	299	5								
300	12	301	17								
301	19	302	3								
302	5	302	9								
303	18	303	21								
303	24	303	25								
305	16	305	22								
306	2	306	10								
306	16	306	21								
308	23	309	4			308	1	308	2		
						308	18	308	22		
309	6	309	7								
309	9	310	2								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
311	13	311	21								
312	3	312	7								
313	15	313	18			313	19	313	22		
315	8	315	17			315	18	316	7		
316	16	318	12	Authentication; Relevance; Rule 403 (confusion, waste of time)							
319	5	319	18			318	22	319	4		
						319	20	320	3		
320	18	320	21								
328	8	328	20			327	13	328	7		
328	24	329	22								
330	3	330	10			330	11	330	21		
332	8	333	24								
334	3	334	8	Relevance; Rule 404(b)							
334	15	334	21	Relevance; Rule 404(b)							
335	2	335	24	Relevance; Rule 404(b); Rule 403 (confusion, prejudice, waste of time)							
337	10	337	14	Relevance; Rule 404(b); Rule 403 (confusion, prejudice, waste of time)							

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
337	18	337	21	Relevance; Rule 404(b); Rule 403 (confusion, prejudice, waste of time)		337	23	338	9		
342	6	342	18	Relevance; Rule 404(b); Rule 403 (as to 342:16-18) (confusion, waste of time)		342	19	342	20		
						343	5	343	8		
343	11	343	18								
343	23	344	9	Relevance; Rule 404(b)							
344	14	345	23	Relevance; Rule 404(b)		345	24	345	25		
346	1	347	5	Relevance; Rule 403 (confusion, waste of time); Rule 412							
347	18	348	14	Relevance; Rule 412							
348	22	349	8	Relevance; Rule 412							
349	20	350	3								
352	1	352	4	Relevance; Rule 412		352	5	352	13		
352	15	352	21								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

AFFIRMATIVE DEPOSITION DESIGNATIONS						COUNTER DESIGNATIONS					
Page/Line Begin		Page/Line End		Objections	Replies to Objections	Page/Line Begin		Page/Line End		Objections	Replies to Objections
353	19	353	21	Relevance; Rule 404(b); Rule 403(prejudice, confusion, waste of time)							
354	9	354	10	Relevance; Rule 404(b); Rule 403(prejudice, confusion, waste of time)							
354	14	354	22	Relevance; Rule 404(b); Rule 403(prejudice, confusion, waste of time)							
356	8	356	24	Relevance; Rule 404(b); Rule 403(prejudice, confusion, waste of time)							
357	10	357	15	Relevance; Rule 404(b); Rule 403(prejudice, confusion, waste of time)		357	16	357	17		
357	18	357	22	Relevance; Rule 404(b); Rule 403(prejudice, confusion, waste of time)							



**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
358	10	359	3	Relevance; Rule 404(b); Rule 403(prejudice, confusion, waste of time)							
360	24	361	7	Relevance; Rule 404(b); Rule 403(prejudice, confusion, waste of time)							
363	5	364	15	Relevance; Rule 403 (confusion, waste of time)							
365	1	365	13								
367	10	367	25	Relevance; Rule 403 (confusion, waste of time)							
371	6	371	21								
373	22	374	2								
374	12	374	23								
376	22	377	8								
377	10	377	12			377	14	377	23		
377	25	378	6								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b> Jane Doe 1 (Kristin Krawczyk)											
<b>DEPOSITION DATE:</b> 9/22/2022-23											
<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
6	17	6	25								
8	8	8	12								
8	16	8	24			8	25	9	2		
9	4	9	13			9	14	10	11		
12	5	13	2								
13	18	14	3			13	3	13	7		
14	5	14	12								
16	10	17	8			17	9	17	13		
19	9	19	22								
20	2	20	20			20	21	20	23		
20	24	22	5			22	6	22	23		
27	2	28	1								
28	6	29	3								
31	22	32	6			32	10	32	12		
32	13	32	19								
34	3	34	5								
34	19	35	13			35	14	36	1		
						36	14	36	25		
38	15	38	19								
38	21	39	4								
40	18	41	20								
42	4	42	8								
45	2	45	11								
46	14	46	21								
47	7	48	16								
49	20	50	11								
54	22	54	24								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
55	1	55	15								
58	16	59	3								
64	10	65	13								
66	25	67	3								
69	21	70	2			70	3	70	10		
71	2	71	9								
71	24	72	7			72	8	72	16		
73	3	73	21			72	25	73	2		
74	12	74	23								
76	1	76	16								
80	23	81	20								
91	23	92	4								
92	18	94	5								
94	17	95	8								
114	18	114	22								
115	3	115	11								
115	16	115	22			115	23	116	9		
116	10	116	18								
119	14	120	2								
120	7	121	7			121	8	122	2		
122	9	122	16			122	17	123	5		
125	17	125	23								
139	8	139	23	Relevance; Rule 404(b); Rule 403 (prejudice, confusion, waste of time)							
140	15	140	22								
144	6	145	4								
147	7	148	17								
149	1	149	14								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
150	18	150	24								
152	17	152	22								
153	12	154	3								
154	9	155	3								
157	19	158	4								
158	8	158	20			158	21	159	1		
160	7	160	21								
163	10	165	24								
167	8	167	16								
168	16	169	3								
169	12	170	5								
171	9	173	15								
173	19	173	25			174	1	174	6		
174	7	175	1			175	2	176	2		
177	13	177	17	Relevance; Rule 404(b); Rule 403 (prejudice, confusion, waste of time)							
177	20	179	3	Relevance; Rule 404(b); Rule 403 (prejudice, confusion, waste of time)							
180	6	180	12								
180	16	181	9								
182	10	182	14			182	15	182	19		
						182	21	182	24		
183	7	183	9	Authenticity, Hearsay, Relevance							

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
183	18	184	4	Authenticity, Hearsay, Relevance							
184	14	185	19	Authenticity, Hearsay, Relevance		185	21	186	6		
186	18	187	8	Authenticity, Hearsay, Relevance							
187	12	187	14								
187	16	187	23								
188	11	188	17	Authenticity, Hearsay, Relevance							
190	3	190	16	Authenticity, Hearsay, Relevance							
190	25	191	21	Authenticity, Hearsay, Relevance							
192	2	192	25	Authenticity, Hearsay, Relevance							
193	11	194	12								
195	6	195	10	Authenticity, Hearsay, Relevance; Rule 403 (prejudice, confusion, waste of time); Rule 404(b)							

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
195	23	198	11	Rule 403 (prejudice, confusion, waste of time)							
198	22	201	13			201	14	201	23		
201	24	203	22								
204	13	204	18								
207	21	208	2			208	3	208	4		
208	5	208	22			208	23	209	3		
210	2	210	11	Relevance; Rule 403 (confusion, waste of time)							
210	24	211	1			210	20	210	23		
211	11	211	16			211	17	211	24		
213	13	213	25								
215	14	216	12								
217	7	217	18								
218	2	218	4								
219	8	219	22								
220	4	220	19								
220	24	222	2								
222	14	222	19								
225	6	226	18								
226	22	227	12			227	13	227	20		
228	20	229	3								
236	3	236	6								
240	23	241	2								
241	12	241	24								
242	9	242	13			242	14	242	16		
242	17	243	9			243	10	243	12		
243	14	243	24								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
244	6	244	22								
245	5	245	13								
245	18	246	15								
248	3	249	8			249	9	249	20		
249	21	251	4			251	5	251	20		
254	6	254	22			254	25	255	5		
255	10	255	25								
256	3	256	10								
256	19	257	3								
263	16	264	18	Relevance; Rule 403 (prejudice, confusion, waste of time); Rule 404(b)		264	19	265	2		
265	3	266	1	Relevance; Rule 403 (prejudice, confusion, waste of time); Rule 404(b)							
266	23	267	14	Relevance; Rule 403 (prejudice, confusion, waste of time); Rule 404(b)							
268	1	268	7	Relevance; Rule 403 (prejudice, confusion, waste of time); Rule 404(b)							
268	13	268	17			268	18	269	2		

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
269	14	269	21			269	22	270	9		
Vol. 2 9/23/2022											
4	23	5	2								
5	6	5	13								
5	21	6	1								
6	5	6	20			6	21	7	9		
7	10	7	20								
7	24	9	4			9	5	9	8		
10	17	11	4								
17	22	17	24								
18	1	18	6								
28	4	29	5								
40	2	40	16								
40	22	40	24								
41	21	42	5								



**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	Nha Luan (Vickie) Lam
<b>DEPOSITION DATE:</b>	3/11/2022

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
12	8	12	12								
15	7	16	18								
19	21	20	16								
21	2	21	4								
31	2	32	7								
32	9	32	10								
39	8	40	22								
42	9	43	20								
43	22	43	23								
43	25	44	24								
45	8	46	9								
46	11	46	12			46	7	46	9		
48	4	48	13								
48	15	48	18								
49	23	50	17			49	6	49	22		
51	7	51	9								
51	11	52	12								
52	16	53	20								
88	22	90	15								
90	24	91	13								
91	15	91	16								
95	12	95	23								
96	10	96	15			96	16	96	20		

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

96	21	97	15			97	16	98	25		
						99	2	100	12		
						100	14	100	18		
						100	20	101	9		
						101	12	101	15		
102	23	102	25								
150	10	151	19			151	20	152	12		
190	22	191	3			190	10	192	10		
224	14	224	21			224	22	225	25		
						226	3	226	5		
						226	7	226	15		
						226	17	226	24		
229	18	229	22			229	12	229	17		
229	24	230	7								
230	18	230	20			230	21	230	22		
						230	24	231	15		
231	16	231	22			231	23	231	2		
						232	4	232	6		
232	8	232	19								
237	18	240	1								
277	21	227	24			277	25	278	9		
316	18	317	14								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

WITNESS NAME: George Limbert

DEPOSITION DATE: 4/27/2022

AFFIRMATIVE DEPOSITION DESIGNATIONS						COUNTER DESIGNATIONS					
Page/Line Begin		Page/Line End		Objections	Replies to Objections	Page/Line Begin		Page/Line End		Objections	Replies to Objections
14	21	14	24								
16	7	17	23								
24	4	24	14								
29	14	29	21			29	10	29	13		
						30	1	30	12		
34	14	34	15			34	21	35	10		
34	17	34	17								
34	19	34	20								
37	19	37	22								
38	2	38	4								
39	25	40	13								
40	22	41	4			41	5	41	7		
						41	12	41	17		
42	2	42	6								
50	12	50	17								
52	13	52	16			53	1	53	4		
53	10	53	16			53	17	54	2		
						54	10	54	13		
68	2	68	17			68	18	68	23		
						68	25	69	2		
85	2	85	10			85	11	85	25		
86	1	86	12			86	13	86	16		
						86	19	87	1		
						87	12	87	15		
						87	20	87	25		

[illegible]

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	Meghan Harrsch (M.H.)
<b>DEPOSITION DATE:</b>	10/5/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS****COUNTER DESIGNATIONS**

<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>	<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>
8	23	9	3								
10	12	16	1	Irrelevant, prejudicial, confusing and misleading. Her testimony is not that the "plaintiffs" tried to get her "in on something," only JD2.							
16	4	16	11								
16	22	17	5	Nonresponsive, speculative, and asks for information she does not possess.							
18	15	18	19								
18	21	18	21								
19	3	19	7	Speculation; asks for information she can't know.							
19	9	19	12	See above.							
19	14	19	25								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

20	2	21	17	Irrelevant, prejudicial, confusing and misleading. The witness recants this testimony as to Kristin.		21	8	21	12		
21	20	21	25								
22	2	27	10	Speculation; asks for information she can't know as to Kristin having sex with Bob Patel.							
27	20	27	23	Speculation; asks for information she can't know as to Micaela having sex with Bob Patel.							
27	25	27	25	See above.							
28	2	28	3	COME BACK							
28	6	30	21	Speculation; asks for information she can't know as to pimps ever paying employees.							
30	23	30	24	Speculation; asks for information she can't know about anyone ever paying any employee.							

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

31	1	31	1	See above.							
31	10	32	18								
32	20	35	18								
37	21	37	23	Irrelevant, prejudicial, confusing and misleading. That hotel is not at issue in this case.							
38	12	44	12	Cumulative; these questions were asked and answered as to history with pimps and JD2 contacting her about the lawsuit.							
44	14	46	12								
46	19	51	10	Cumulative; these questions were asked and answered as to which hotels she stayed at with which pimps and her drug history, keeping money from Shivers and spending it, keeping it "quiet."							
51	12	54	20								
55	5	55	7								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

55	9	55	12								
56	10	56	25								
57	7	58	4	Calls for legal conclusion.							
58	8	58	10	See above.							
58	12	58	12	See above.							
58	16	58	19	See above.							
58	21	60	3	See above.		60	4	60	9		
60	17	60	23	Speculation; asks for information she can't possess as to whether Kwan was ever violent; and whether Micaela ever threatened violence or withheld drugs.							
60	25	62	23	Cumulative; these questions were already asked and answered.		61	7	62	23		
63	15	64	7								
66	2	66	24								
67	2	68	19	Irrelevant, prejudicial, confusing and misleading. The Microtel is not at issue in this lawsuit.		68	9	68	19		



**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

69	14	70	9	Irrelevant, prejudicial, confusing and misleading as to asking if Kristin called anyone about joining the lawsuit, which the witness already testified never happened and vague, speculative, and leading as "she was involved in it in some way" after witness testified she had never talked to Kristin about it.							
71	4	71	15			71	4	71	10		
75	22	79	3			79	4	79	8		
						79	10	79	18		
						80	5	80	21		
81	12	83	10			81	2	81	12		
83	21	84	7								
85	9	85	18			84	20 (begin with "before")	85	8		
87	14	87	25			86	3	86	22		
88	8	89	13			89	14	89	19		
						89	24	90	12		
91	21	92	4								
92	9	92	12								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

92	14	92	19								
92	21	92	21			93	1	93	6		
95	25	96	19			95	16	95	24		
97	6	97	8			99	16	100	14		
						100	21	101	4		
103	18	103	21			103	2	103	5		
						103	8	103	12		
103	24	104	13			103	15	103	16		
104	16	104	16			104	20	104	24		
						105	3	105	10		
						106	2	106	5		
						107	1	107	6		
						107	18	108	11		
						108	12	109	13		
						109	21	110	5		
114	25	115	7	Irrelevant as to where she lives (also unsafe) and what she wears there.		111	14	111	20		
						111	23	112	14		
115	11	115	19								
115	23	116	6								
117	4	118	5			118	11	118	15		

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	Tom McElroy
<b>DEPOSITION DATE:</b>	7/6/2022

<b>AFFIRMATIVE DEPOSITION DESIGNATIONS</b>						<b>COUNTER DESIGNATIONS</b>					
<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>	<b>Page/Line Begin</b>		<b>Page/Line End</b>		<b>Objections</b>	<b>Replies to Objections</b>
8	4	8	9	Attorney testimony; not admissible							
8	24	8	25								
9	1	9	3								
15	23	15	25								
17	4	17	9								
18	10	18	20								
21	25	21	25								
22	1	22	16			22	17	23	11		
						24	10	24	12		
						24	14	24	23		
27	23	27	25			26	20	27	13		
						27	15	27	21		
28	3	28	9			30	3	30	6		
						30	8	30	8		
48	25	48	25								
49	1	49	6								
49	25	49	25								
50	1	50	2								
50	4	50	9			50	11	50	13		
						50	15	50	25		
55	22	55	23								
55	25	55	25			56	2	56	23		
						57	1	57	4		
						57	6	57	16		
70	14	70	25								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

71	1	71	1								
78	24	78	25								
79	1	79	6	5-6 Argumentative, Mistates evidence, call for legal conclusion, vague							
79	8	79	8	see objection above							
79	17	79	21	Argumentative, Mistates evidence, assumes facts not in evidence							
79	23	79	24	see objection above							
80	10	80	13								
80	14	80	21	17-21 call for legal conclusion, assumes facts not in evidence, vague							
80	23	80	23	see objection above							
80	25	80	25	call for legal conclusion, assumes facts not in evidence, vague							

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

81	1	81	2	call for legal conclusion, assumes facts not in evidence, vague						
81	20	81	25							
82	1	82	2							
82	16	82	25							
83	1	83	3							
83	6	82	25							
84	1	84	25	23-25 - Argumentative, Mistates evidence, assumes facts not in evidence						
85	2	85	2	see objection above						
85	13	85	24							
88	8	88	14	14 - Argumentative, Mistates evidence, assumes facts not in evidence						
88	16	88	19	see objection above						
88	23	88	23	Argumentative, Mistates evidence, assumes facts not in evidence						
88	25	88	25	see objection above						

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

89	1	89	1	see objection above							
89	11	89	13	assumes facts not in evidence, vague							
89	24	89	25	Argumentative, Mistates evidence, assumes facts not in evidence							
90	1	90	1								
90	4	90	16								
91	4	91	8								
110	14	110	25								
111	24	111	25								
112	1	112	25			113	5	114	13		
115	17	115	24								
117	1	117	25	24-25 Argumentative, Mistates evidence, calls for legal conclusions							
118	1	118	1								
118	8	118	16			118	7	118	7		
						118	17	118	24		
119	5	119	6								
119	8	119	12								
119	14	119	14								
119	16	119	25								
120	1	120	5								
120	7	120	7								
120	9	120	25								
121	1	121	9								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

121	25	121	25								
122	1	122	5			122	6	122	9		
122	19	122	21			122	12	122	18		
122	23	122	23								
123	10	123	21								
123	23	123	25								
124	1	124	2								
124	6	124	9	Question is at line 4: vague							
124	11	124	19								
126	15	126	25								
127	1	127	1								
128	16	128	25								
128	1	128	15			129	16	129	17		
134	7	134	21			134	22	135	14		
137	16	137	25								
138	1	138	2			139	12	139	19		
						139	25	140	7		
						140	14	140	21		
						140	24	140	24		
						141	1	141	3		
						141	5	141	12		
						141	15	141	17		
						141	21	141	24		
						142	1	142	12		
						142	14	142	20		
						142	22	143	1		
						143	3	143	7		
						143	9	143	13		
						143	15	143	19		
						143	21	143	21		

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

144	7	144	18			144	19	145	20		
						145	22	146	1		
						146	3	146	3		



**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

WITNESS NAME: James Moyer

DEPOSITION DATE: 3/18/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS****COUNTER DESIGNATIONS**

<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>	<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>
14	12	14	15								
18	18	19	7								
19	14	19	24								
20	5	22	23								
23	2	23	8								
26	1	26	9			26	10	26	16		
26	17	26	21								
29	20	30	18			29	18	29	19		
31	5	31	21								
32	10	32	19			32	20	33	9		
33	10	33	23								
34	8	34	12								
34	23	34	25			35	1	35	10		
35	13	35	24								
36	9	36	13								
38	3	38	7								
45	25	46	23			45	15	45	24		
48	10	48	23								
48	25	49	2								
49	4	51	4			51	5	51	14		
52	11	53	14			51	20	51	22		
						51	25	52	10		
58	19	59	1			59	2	59	19		
63	7	64	9								
64	23	65	25			66	3	66	4		
80	1	80	16								
81	13	81	20								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

118	5	118	12								
121	9	122	13			122	14	122	23		
123	20	124	4								
130	9	130	13			129	23	130	8		
130	16	131	1								
131	3	131	8			131	10	133	13		
						131	16	133	4		
						133	6	133	7		
134	15	134	16								
135	1	135	3								
135	7	135	16			135	17	136	3		
136	4	136	13			136	14	136	19		
136	20	136	25								
137	2	137	17								
137	19	137	21			137	23	138	2		
						138	5	138	5		
						138	9	138	9		
141	1	141	12			141	13	141	16		
143	4	143	8								
143	16	143	20								
143	24	143	25								
144	2	144	5			144	10	145	11		
145	13	145	23			145	24	146	4		
147	10	147	16			147	2	147	9		
149	24	150	16			148	15	149	23		
150	18	151	14								
151	16	152	5								
153	13	153	16			152	6	152	15		
						152	17	152	23		
						152	25	153	10		
154	11	154	16								
154	18	155	1								
155	3	155	5								
155	7	155	9								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

155	13	155	16								
155	22	156	6								
156	11	156	14			156	15	157	2		
159	4	159	15								
160	5	161	7			161	8	161	11		
161	13	161	21			161	22	162	1		
162	5	163	10								
163	12	163	13								
163	15	163	19								
163	23	164	2								
164	5	164	6								
164	16	164	19								
164	21	164	25			165	1	165	2		
165	3	165	10			165	11	165	20		
167	3	167	16			167	17	167	18		
167	19	168	5			168	6	168	22		
168	23	169	6			169	7	169	11		
						169	13	170	16		
171	23	172	7			172	8	173	4		
173	5	175	13			175	14	176	13		
179	1	179	5								
179	7	179	12			179	25	181	4		
181	9	181	16								
192	8	193	7			191	23	192	7		
195	19	195	21								
213	16	217	10			209	14	211	21		
						211	23	213	11		
						213	13	213	14		
218	12	219	21			219	11	219	21		
229	2	230	16			228	4	229	1		
230	18	231	11								
231	13	231	17								
231	25	232	11								
232	14	232	19								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

232	22	233	1			233 233	2 24	233 236	22 3 (end with "it")		
236	5	236	11								
236	13	236	15								
236	17	236	23								
239	6	240	22			240	23	241	17		
246	16	247	11			245	22	246	15		
						247	12	247	25		
248	1	248	13			248	14	248	18		
248	19	249	8			249	9	250	9		
250	10	250	23								
253	14	254	25			251	2	252	23		
						255	1	256	8		
						256	10	256	19		
						256	22	257	22		
257	23	258	11			258	12	262	11		
264	16	264	24			262	14	264	15		
265	12	266	18								
266	20	267	13								
281	9	283	2								
283	10	283	24			283	25	284	4		
						284	7	284	9		
285	8	286	25			284	13	285	7		
						287	1	287	2		
						287	5	287	13		
						287	16	288	14		
304	12	304	20			301	6	304	11		

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

313	15	313	24			312 312 313 3133 14 314 315 315	17 24 2 8 1 10 20 25	312 312 313 313 314 315 315 316	21 25 6 14 8 17 22 7		
327	23	328	7								
329	7	329	11								
330	2	330	12								
330	14	330	16								
330	18	332	12								
344	11	345	16								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	Gregory E. Stocker
<b>DEPOSITION DATE:</b>	5/11/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS****COUNTER DESIGNATIONS**

<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>	<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>
8	14	8	16								
18	25	18	25								
19	1	19	7								
19	13	19	24								
21	3	21	16								
22	17	22	23			22	24	23	8		
24	9	24	23			24	24	26	3		
26	4	26	25								
27	1	27	25								
28	1	28	25								
29	1	29	3			29	4	29	17		
36	10	36	25			30	5	32	16		
						32	24	33	11		
						33	16	33	19		
						33	21	33	25		
						34	16	35	3		
						35	7	36	9		
37	1	37	7			37	8	37	9		
						37	11	37	11		
38	8	38	25			37	18	37	22		
						37	24	38	7		
39	1	39	3			39	4	39	22		
						40	10	40	18		
						41	3	41	11		
62	22	62	25			63	23	64	1		
						64	11	64	25		
63	1	63	22								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

68	12	68	20								
68	25	68	25								
69	1	69	15			69	21	69	23		
						69	25	70	9		
						70	11	70	12		

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	Gregory E. Stocker - 30(b)(6) Vol II
<b>DEPOSITION DATE:</b>	9/21/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS****COUNTER DESIGNATIONS**

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243	22	243	24	Leading							
244	1	244	1	Leading							
244	3	244	6	Leading							
244	23	244	25	Leading							
245	1	245	1	Leading							
245	4	245	7	Leading							
245	9	245	9	Leading							
245	11	245	18			245	19	245	25		
247	8	247	11								
249	13	249	17	Compound, irrelevant, prejudicial, confusing, and misleading. There has been no evidence offered in this case that racial profiling is related to identifying prostitution and/or sex trafficking taking place at hotels, other than by Defendants to introduce irrelevant, prejudicial, and confusing evidence and to mislead the jury.							
249	20	249	24	Irrelevant, confusing, and misleading. See prior objection.							
250	3	250	5	See prior objection.							
250	7	250	19	250:7-10 - see prior objection.							
250	21	250	23								



**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

250	25	250	25								
251	1	251	14								
251	22	251	25								
252	1	252	2								
						260	19	260	20		
						260	22	260	22		
						260	24	260	25		
						261	2	261	2		
						261	4	261	5		
						261	7	261	7		
						261	9	261	9		
						261	11	261	12		
						261	14	261	16		
						262	5	262	7		
						262	9	262	11		
						262	13	262	14		
						262	16	262	16		
						262	18	262	18		
						262	21	262	22		
						262	24	263	1		
						263	4	263	14		
						263	16	263	19		
						263	21	263	21		
						263	23	263	23		
						263	25	264	3		
						264	5	264	8		
						264	10	264	11		
						265	10	265	18		
						265	20	265	21		
						266	23	267	1		
						267	11	268	3		
						268	6	268	11		
						269	7	269	24		
						270	1	270	1		

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

						270	3	270	5		
						270	11	271	5		
						271	7	271	7		
						271	9	271	11		
						271	13	271	13		
						271	15	271	15		
						271	17	271	18		
						272	6	272	8		
						272	11	272	15		
						272	17	272	21		
						272	23	273	1		
						273	4	273	10		
						273	13	273	16		

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

<b>WITNESS NAME:</b>	Vincent Vittatoe
<b>DEPOSITION DATE:</b>	5/3/2022

**AFFIRMATIVE DEPOSITION DESIGNATIONS****COUNTER DESIGNATIONS**

<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>	<i>Page/Line Begin</i>		<i>Page/Line End</i>		<i>Objections</i>	<i>Replies to Objections</i>
6	12	6	14								
12	2	12	11								
13	7	13	13								
14	3	14	23								
15	15	15	25								
16	1	16	20			17	15	18	7		
						19	1	19	5		
						19	18	19	23		
21	5	21	18			20	6	20	13		
22	3	22	7			22	8	22	17		
						22	19	22	22		
						22	24	22	24		
						23	16	23	17		
						23	19	24	10		
						24	25	24	25		
25	1	25	4								
25	9	25	25								
26	1	26	4								
26	15	26	22								
27	3	27	17								
28	12	28	25								
29	1	29	9								
29	15	29	25								
30	1	30	7								
30	21	30	24			30	25	31	13		
31	20	31	25								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

32	1	32	11			32	22	33	7		
						33	20	34	8		
						34	19	35	1		
35	2	35	19								
36	16	36	24								
37	1	37	3								
37	22	37	23								
38	1	38	3			39	19	39	25		
						40	3	40	4		
						40	6	40	8		
						40	10	40	16		
						41	6	41	8		
						41	12	41	22		
47	1	47	16								
48	13	48	25								
49	1	49	14			49	15	49	21		
49	22	49	25			50	3	50	5		
50	1	50	2								
53	15	53	25								
54	1	54	8								
54	10	54	23								
56	4	56	15			56	16	56	21		
56	22	56	25								
57	1	57	2			57	3	57	11		
57	12	57	25								
58	1	58	15								
58	17	58	19			58	21	58	25		
						59	10	59	11		
						59	17	60	3		
60	12	60	25								
61	1	61	15								
61	17	61	18								
62	14	62	25								
63	1	63	12			64	22	64	25		

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

65	1	65	6								
65	7	65	17								
66	6	66	8								
66	10	66	25								
67	2	67	8								
67	16	67	17								
67	19	67	24			67	25	68	5		
69	9	69	18			69	19	70	5		
70	6	70	11			70	12	70	22		
						70	24	70	24		
71	17	71	25			71	4	71	6		
						71	8	71	16		
72	1	72	3								
72	8	72	19								
72	23	72	25								
73	1	73	16								
73	18	73	25								
74	1	74	15								
74	18	74	22								
74	24	74	25								
75	1	75	3			75	11	76	3		
76	24	76	25			76	18	76	23		
77	1	77	2								
77	13	77	20								
77	25	77	25								
78	1	78	2			78	24	79	12		
						79	23	80	21		
81	7	81	25								
82	1	82	19								
83	4	83	7								
83	14	83	25								
84	1	84	19								
84	25	84	25								
85	1	85	3								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

85	5	85	16			85	20	85	23		
85	24	85	25								
86	1	86	1			86	2	86	8		
86	9	86	14			86	15	86	20		
86	21	86	25								
87	1	87	2			87	3	87	15		
87	16	87	25								
88	1	88	1								
88	13	88	25								
89	1	89	23			89	24	90	2		
90	6	90	13			90	14	90	15		
						90	17	90	24		
						91	1	91	6		
						91	8	91	15		
92	14	92	21								
93	2	93	19			93	20	92	22		
						93	24	94	1		
94	9	94	20			94	21	94	23		
95	17	95	25								
96	1	96	18			96	21 (begin with "Did")	97	2		
97	3	97	19								
98	15	98	17								
98	19	98	22								
99	15	99	23								
100	5	100	10								
101	13	101	16								
102	5	102	8			102	9	102	19		
102	20	102	23			102	24	103	1		
103	2	103	10			103	21	103	25		
105	22	105	25								

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

106	1	106	15			106	16	106	25		
						107	21	108	8		
108	9	108	17			108	18	108	25		
109	1	109	25								
110	1	110	10			110	11	110	18		
110	19	110	23								
111	5	111	16			111	17	112	1		
112	2	112	4								
112	6	112	9			112	10	112	20		
						113	5	113	6		
						113	8	113	12		
114	5	114	9			114	21	114	23		
						114	25	115	4		
115	5	115	9			115	10	115	15		
115	22	115	25								
116	1	116	5			116	6	116	9		
						116	12	117	12		
						118	4	118	19		
						120	20	121	6		
						121	8	121	12		
						121	14	122	2		
						122	4	122	5		
123	21	123	25								
124	1	124	2			124	10	124	15		
126	12	126	24								
131	3	131	6								
131	8	131	18			131	20	133	4		
						133	6	133	23		
135	8	135	11								
135	13	135	21			135	23	137	2		
						137	4	137	12		
						137	18	137	25		
						140	23	141	5		

**ATTACHMENT J-2 DEFENDANT DEPOSITION DESIGNATIONS WITH PLAINTIFF OBJECTIONS AND COUNTERS**

141	6	141	8			141	10	142	7		
						142	16	142	24		
						143	5	143	8		
						143	12	143	23		
141	10	141	19								
150	12	150	25								
151	1	151	7	3-7, 9 - Leading							
151	9	151	13	10-13 - Leading							
151	20	151	22	Leading							
151	24	151	25								
152	1	152	3	Leading							
152	5	152	5								
152	8	152	25								
153	1	153	3			153	11	154	12		